

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr Stewart Felstead
Comment ID	PS1
Response Date	14/01/13 11:18
Consultation Point	18 Appendix C- Nature Designations List ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

Please ignore my responses to the Legallity and Soundness of the plan as I do not feel qualified to respond to either question without further reading.

I would however like to understand why both Dudas Wood and Derrington Millenium Green have been excluded from Appendix C when the Millenium Green is a nominated SBI - <http://www.derrington.org.uk/page3.html>

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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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr Andrew Lavelle
Comment ID	PS2
Response Date	15/01/13 10:55
Consultation Point	2.19 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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**Do you consider The Plan for Stafford Borough is unsound because it is not:** Justified

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Elsewhere in the report, data for 2012 is being quoted, yet the population information in this section is still referring to 2001.

This should be updated for 2011 Census information, released in December 2012 to provide a more up to date overview of the population and its needs.

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Update Census data from 2001 to 2011

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## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr Bill Hilton
Comment ID	PS3
Response Date	15/01/13 19:38
Consultation Point	12 POLICY STONE 1 ? STONE TOWN ( <a href="#">View</a> )
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.

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For goodness sake use plain English! **iv. Improving access to the rail station and secure appropriate levels of parking for both cars and bicycles; v. Ensuring there is adequate provision for taxis through extending existing or creating new appropriately placed taxi ranks;** I wish to add my opinion on the above part of the plan. Firstly Station Approach does badly need to be repaired. The parking of vehicles is rather haphazard in that it occurs on both sides of the road sometimes partially blocking access to the station. I think that parking bays would be a good idea showing motorists where they are allowed to park. I think that a small parking charge could be applied but not so much that it adversely effects the successful growth of the railway foot passengers. Remember the Station house is owned by two charities and Stone Council so many motorists come to the station to attend meetings. There are some disabled people who need to be able to park right next to the front door of the Station house. There needs to be a good space left near to the station house to allow turning around safely. If there is to be a taxi rank here then please make it a Taxi & Private Hire Rank. There aren't many

Taxis in stone and to exclude the Private Hire cabs would be poor practice & poor service to the public of Stone. This same reasoning should be applied to any other planned & existing taxi ranks in Stone. The station needs more facilities. The estimated foot passenger growth over the last 4 years is; 25K, 50K, 75K & +100K. There is a need for toilets, ticket sales, cafe & waiting rooms.

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## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr Ted Pick
Comment ID	PS4
Response Date	16/01/13 12:22
Consultation Point	12 POLICY STONE 1 ? STONE TOWN ( <a href="#">View</a> )
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 Local Plan Strategy is Legally compliant?** No

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**Do you consider that the Plan for Stafford Borough is Sound?** No

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

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

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

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Westbridge Park is the "lung" of Stone. At the present time the last thing we need is another supermarket in Stone. A large Tesco store is likely to destroy Morrisons in the long term and in the short term close the newly opened frozen food store in the High Street together with the Coop which must be already struggling since Aldi opened. This would blight the whole High Street and destroy the attractiveness of the town. Building on Westbridge Park will stop the annual Carnival & Food Festival and close the football pitch and other activities. This open park in the centre of Stone makes the town the attractive and desirable place it is. You are well aware of the intense opposition to this plan by the inhabitants of Stone, and you are ignoring the democratic process in forcing this through. Yes, there is the large green space of the Common Plot, but this is so out of the way that visitors to

the town never see it and its position makes it totally unsuitable for both the Carnival and the Food Festival.

Building more housing to the west of Stone is a plausible idea, but not without considerable development of Eccleshall Road, in particular the junction with the A34.. At present at busy times there is a significant queue of traffic, causing difficulty in egressing from the side roads. Without road changes this will become very bad after development of extra housing. The use of the Walton ex-ministry estate by motorists as a rat run will multiply, causing great danger in general and an intolerable nuisance to the inhabitants of that estate.



## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr Barry Apps
Comment ID	PS5
Response Date	23/01/13 15:10
Consultation Point	10.6 Paragraph ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.3

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**Do you consider that the Local Plan Strategy is Legally compliant?** Yes

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**Do you consider that the Plan for Stafford Borough is Sound?** No

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**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Justified  
. Effective

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The Raleigh Hall proposed development hasn't got good links to the main transportation networks and would seriously increase overall levels of congestion. It is a minimum of six/seven miles to a dual carriageway and this is along narrow roads and some tight bends one of which is on a bridge! For safety reasons this site should not be expanded, there are no pavements and virtually no grass verges along any of the "A" roads out of Eccleshall. Furthermore it is also critical for safety reasons that the new developments do not generate increased usage of heavy goods vehicles along roads which are unequipped for such traffic.

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**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.**

All Business Parks/Industrial Estates must be sited with direct dual carriageway access from the park to the motorway network, not along narrow bendy "A" roads.

This is not the wording which will correct this document. But will prevent negative actions taking place for the people who live Staffordshire.

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## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr Barry Apps
Comment ID	PS6
Response Date	23/01/13 15:14
Consultation Point	22 Policy T1 ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Justified  
. Effective

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This Plan is NOT justified or appropriate. With regards to Raleigh Hall Industrial Park. Policy T1 (d) states it wants to encourage cycling and walking! As any extension to Raleigh Hall will generate even more heavy traffic than there is already, how can the cycling and walking be encouraged? There is not an "A" road (A 519, A 5013 or even the B5026) in Eccleshall which has a pavement outside the town or even a grass verge for miles. This does not encourage either cycling or walking.

Policy T1 (g) Traffic flows including commercial traffic must be located in close proximity to primary road network and not have a negative impact on the network or junctions! Raleigh Hall does not meet these commitments, the road network to and into Eccleshall has such narrow roads that the heavy goods have to slow right down to pass another heavy goods, on a few corners one of the vehicles actually has to stop to let the other vehicle through. It is not possible for a car to pass a pushbike or pedestrian if another car is coming in the opposite direction let alone a heavy goods vehicle. In

Eccleshall on the A 519 in Stafford Street it impossible for a heavy goods vehicle to pass another heavy goods, they have to take it in turns, this I would call a very negative inpact.

Policy T1 (h) Proposals that generate significant levels of traffic which cannot be accommodated in terms of capacity and road safety will not be permitted! The above sections T1 d and T1 g answers this, Raleigh Hall should not be expanded.

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## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr Barry Apps
Comment ID	PS7
Response Date	23/01/13 15:46
Consultation Point	9.16 Paragraph ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.2

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**Do you consider that the Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Justified  
. Effective

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Raleigh Hall at Eccleshall does not have good transport links to Stafford, SOT or the M6. Raleigh Hall is situated on the outskirts of Eccleshall and nearest main road is the A519. This is about 8 or 9 miles from the M6 North, this is a relatively narrow road with a large number of bends and one of these on a bridge. In the other direction to Stafford via A5013 which is about 7 miles, this is even narrower with no pavements or grass verges for most of the way. To call either of these roads a good transport link is a misuse words. If you are behind a heavy commercial vehicle at the start of these roads there is a very good chance you will still be behind 7 or 9 miles later. The A34 is a good link between Stafford, M6 North, M6 South SOT etc because this is a dual carriageway not a minor "A" road.

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## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr Christopher Tibbitts
Comment ID	PS8
Response Date	23/01/13 18:39
Consultation Point	12 POLICY STONE 1 ? STONE TOWN ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.3

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**Do you consider that the Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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I think it is **fantastic** that something like a new leisure centre could be built - at no cost to the local tax payer - on the **Westbridge Park** site. The existing facilities are in desperate need of a major update, including the play areas and tennis courts. **Every man, woman and child in Stone would have to pay out 500 to have such a facility built.** In a recession, the chance of creating a fantastic facility like this, which will also serve people in surrounding villages, is a really good thing. Especially just after the Olympics!

A new Leisure Centre would help with the obesity problem and it would be cheaper to run and a lot Greener than the existing facilities. It would give money conscious young families and affluent locals alike affordable access to fitness and swimming facilities as well as classes for children etc. It would give us something to do on cold winter nights. It would mean we have changing and toilet facilities

if/when we do use the grassed areas on the park. Also, we live in a Canal town and people drown in the canal every few years - we have to have somewhere to teach people to swim that will be affordable for at least 20 years.

However, there is the issue with using some of the park land to build a supermarket to fund it all... In accordance with the Government commissioned Portas report which made suggestions on how to save the High Streets of Britain, new facilities like a Leisure Centre and new Supermarkets that could be used to help fund them, should be built in, near, or close to High Streets. This encourages people and passing trade. Because there is no money left in the pot section 106 agreements (where things like supermarkets fund local facilities etc) are going to become a lot more common - we might as well get used to it and welcome it with open arms before a supermarket builds elsewhere and doesn't need to pay a premium for land on Westbridge resulting in us missing our chance.

Lots of new jobs would also be created in Stone if a new Leisure centre and Supermarket was built - this is great, and it would help the High Street as people would have more money to spend and there would be more people physically in and around the Town centre. Also, don't forget the contractors that would be employed to build and maintain new developments - they would spend money here too. People saying that a new supermarket is not needed have not done their homework. They have not tried shopping in Morrisons at peak times either! Busy workers and people with young families need more convenient local shopping facilities as they only have Saturdays and Sundays to do anything really. A factual retail need has already been confirmed in Stone and that was based on 2010 levels, nevermind when 500+ new homes are built - we will need even more supermarkets and certainly better leisure facilities!

The park, in its current state, is becoming an eye sore. There is evidence of anti social behaviour, litter, broken glass, flaking paint, evidence of drug use, graffiti... Why on Earth would anyone not want this to be improved and developed? Even if a smallish (1400 sq.m) well designed supermarket, a similar size to Aldi, was to be built along the side of the existing tarmac and tennis courts etc, it would be an improvement on what is there today!

Other ideas for funding have not come forward, so it looks like a supermarket is the only way. Some people actually want a new supermarket on Westbridge Park in its own right anyway - it would offer more choice and competition and it would be accessible without having to use a car. So many people drive to Stoke or Stafford for food shopping and to use a modern swimming pool and gym. So few people use the fields at Westbridge park regularly (I have not seen anyone other than Dog Walkers allowing their pets to foul on the football pitches the last 5 times I have been past) that new Leisure Facilities and a Supermarket to help fund them will be enjoyed by people a lot more than the under used muddy grass which is currently there.

Nobody walks down the High Street with shopping trolleys to do their weekly shop do they? A new Supermarket in Stone (which already has 2 or 3) will not affect the High Street negatively. It can only help. There are so many empty & charity shops that **SOMETHING needs to be done to help the town out and there are no better ideas out there.**

If things are not developed then we will be left in the past. Stone was once a leader in new developments - the Canals being a good example. We have since been left behind and the town is becoming a less desirable place to live and set up a business. The Council can't reduce the private landlords rents on the High Street - they can only improve local facilities and trust that locals then visit and shops in Stone more than they currently do. If they do nothing, or build facilities like Supermarkets and Leisure Centres out of town then the life will be taken away with them.

Anyway, there are lots of green spaces in and around Stone - e.g. the Common Plot, which is about 4 times the size of Westbridge Park as well as the tow paths and the Downs Banks and Crown Meadow - so it's not like we have nowhere to go in the fresh air.

Getting some artists impressions or plans out ASAP will really help everyone to understand what percentage of the grass, if any, would have to be sacrificed to build the Supermarket. But, assuming that the development on Westbridge park only uses a "small percentage" of the grassed area and leaves room for the Food Festival and Fireworks etc then I can't see any sensible argument against



it. A nice modern well designed Leisure Centre and supermarket would be a much nicer sight to greet people who drive into town than the 'blue shed'! Please build the new leisure facilities as soon as possible and be as compassionate as possible about building designs and the design / layout of the new park. Whoever designed the blue shed need not apply for the Architects job again!.

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More specific details on what we would actually get in terms of a new leisure centre (i.e. swimming pool etc.) and dimensions / drawings or artists impressions of what the developed park area would look like would really help.

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## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Severn Trent Water (Mr Mark Jones)
Comment ID	PS9
Response Date	24/01/13 15:54
Consultation Point	7.22 Paragraph ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.2

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Change in text in Paragraph 7.22 to read

'The clean water supply to Stafford is provided by a number of boreholes and three storage reservoirs located north, south east and south west of the town. The current network has spare capacity to the north of Stafford from the Peasley Bank Storage Reservoir. No distribution network reinforcement is required to support the growth in Stafford town, however some areas of the town will need to have the water supply allocated to Peasley Bank service reservoir in the North from Butterhill Service Reservoir in the South West.'

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## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Severn Trent Water (Mr Mark Jones)
Comment ID	PS10
Response Date	24/01/13 15:57
Consultation Point	11 POLICY STAFFORD 4 ? EAST OF STAFFORD ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.2

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Text Change in infrastructure, bullet xx

'Potable Water - Parts of Staford town will require reallocation to Peasley bank Service Reservoir from Butterhill Service reservoir'

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## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Severn Trent Water (Mr Mark Jones)
Comment ID	PS11
Response Date	24/01/13 16:01
Consultation Point	8.20 Paragraph ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.2

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Additional sentence

'Off site reinforcement will be required to secure levels of service to Stone. Current proposals are to reinforce the trunk main network in Stone. It is planned that this is constructed by 2016'

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Severn Trent Water (Mr Mark Jones)
Comment ID	PS12
Response Date	24/01/13 16:03
Consultation Point	13 POLICY STONE 2 ? WEST & SOUTH OF STONE ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.2

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**Do you consider that the Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

**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.**

Infrastructure bullet xiv should read

' Potable water reinforcement required to the trunk main system in Stone'

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Severn Trent Water (Mr Mark Jones)
Comment ID	PS13
Response Date	24/01/13 16:06
Consultation Point	9.18 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

**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.**

bullet point 1 to read

'Water Main running through the laderfields site may require diversion to a new route'

remove reinforcement at Raleigh hall sentence - this is no longer required

*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?**

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

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Severn Trent Water (Mr Mark Jones)
Comment ID	PS14
Response Date	24/01/13 16:12
Consultation Point	13.11 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

**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.**

To read

'Water Supply - as the IDP indicates, there is sufficient capacity in the reservoirs in the area to supply the water demands associated with new development. This has been confirmed by hydraulic modelling results completed by Severn Trent Water. All three Strategic Development Locations at Stafford Town can be supported with some distribution network rezoning. The strategic location at Stone will require some infrastructure reinforcement to support delivery. It is expected that this reinforcement would be funded by Severn Trent Water and is currently planned for delivery in the period 2014-2015. Network Rezoning is likely to be required in Stafford in the period 2016-2020. A new Water Pumping Station is likely to be required in the eastern rural area (Stowe) in the period 2021-25.'

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Severn Trent Water (Mr Mark Jones)
Comment ID	PS15
Response Date	24/01/13 16:19
Consultation Point	13.24 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

**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.**

Water Supply

Total Capital Cost 2011-2031 = 2m

Capital Cost 2011-2016 = 1.7m

Committed funding = 1.7m

Notes - remove 'costs subject to on-going feasibility work'.

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

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Severn Trent Water (Mr Mark Jones)
Comment ID	PS16
Response Date	24/01/13 16:27
Consultation Point	19 Appendix D- Infrastructure ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

**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.**

#### **Stafford Town West - Potable Water**

Delete requirements section and replace with

'Reallocation of supply to Peasley Bank Service reservoir, from Butterhill Service reservoir for areas of the town will facilitate the growth within Stafford Town from a water supply perspective.

Phasing = 2016-20

Capital Cost = 150k

Stafford Town East - potable water

Delete requirements section and replace with

'New Water Pumping Station required in the rural area to the East of Stafford Town at Stowe'

Phasing = 2021-25

Capital Cost = 150k

**Stone Town West - potable water**

add to text '1.2km of 450mm pipe in A34 Stone required to protect water levels of service in Stone'

Phasing = 2013-15

Capital Cost = 1.7m

**Raleigh Hall and Ladfordfields - potable water**

remove reference to reinforcement at raleigh hall - this is not required.

*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?**

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



## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr Alcock
Comment ID	PS17
Response Date	24/01/13 16:54
Consultation Point	12 POLICY STONE 1 ? STONE TOWN ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

**Do you consider The Plan for Stafford Borough 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.*

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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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr Alcock
Comment ID	PS18
Response Date	24/01/13 17:42
Consultation Point	12 POLICY STONE 1 ? STONE TOWN ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

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

I fully support the mixed use allocation at Westbridge Park and the Council's reasoning for this allocation. Westbridge Park is a poorly utilised area, which fails to fulfil its fantastic potential. Furthermore, the existing building and facilities are unsightly and are no longer fit for purpose. Without this allocation, I fear Westbridge Park will continue to deteriorate. This allocation has the potential, if utilised properly, to provide an attractive, vibrant area which will provide a much needed supermarket and improved leisure facilities. As well as this, it will improve the surrounding open space areas. A supermarket (and leisure) need has been identified, therefore, nobody should be in any doubt that people in Stone need, want, require a new supermarket. Stone is also poorly served in terms of leisure provision, as such I welcome the redevelopment of Westbridge to provide for a range of needs and ages.

Notwithstanding my support for the mixed use allocation at Westbridge Park, I would like guarantees from the Borough Council that the new supermarket operator will fund the new leisure centre and associated improvements. I would also prefer if these two developments were linked via a S106 agreement to ensure that Stone is not left with a supermarket but no other improvements.

I fully support a new supermarket in Stone, however this should only be located at Westbridge Park because it is an edge of centre site and, in my opinion, will help encourage more residents to shop within the town centre. This view is also shared by Mary Portas, the Queen of Shops. Any sites located further away from the high street; either greenfield or brownfield will have the opposite effect and, therefore, will have a negative impact of the town centre which i would be totally against.

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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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Miss Louise Cockburn
Comment ID	PS19
Response Date	29/01/13 21:46
Consultation Point	12 POLICY STONE 1 ? STONE TOWN ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

I fully support the mixed use allocation at Westbridge park.

I am a mum to for boy's ages range from 5yr-21yr. I think it is essential for all my boy's and myself to be able to have the use of these new facillities.And what makes it so appealing to myself is the fact that all the facillities will be situated in one place,and Westbridge park is a fantastic location to have all the facillities.

My two youngest boy's both have Autism,neither of them like going to supermarkets,so being able to visit a new well equipt,safe play area, the boy's can play,while myself or my partner could do some shopping in the new food store and pop into town too,and my two eldest sons are looking forward to using the new Leisure centre too.We are all looking forward to family swims.

As the park stands,it looks like a run down dissused wasted land , where as the new development will not only bring the park to life,it will create jobs for many local people,it will be a place where people

will get chance to socialize and meet new friends bringing our community together,which i feel is important too.

Stone and it's outlying villages are growing all the time with new homes and more population of families.This is even more reason for the demand of a new store,play area,Leisure centre with pool.I believe more people should be taking better care of their health and keeping themselves fit,having all the new development will definately improve peoples health and fitness.

This will also attract more people into our town, seeing a beautifull well utilised Westbridge park will definately encourage people to want to come and visit,this will also attract people into our struggling high street.

Please make sure that the play park is of high standard and well equipt like Victoria park,Stafford

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## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mrs Rachel Till
Comment ID	PS20
Response Date	30/01/13 10:18
Consultation Point	8.5 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

I'd just like to put forward that the needs of micro and one-man start up businesses are considered within the plans for employer accomodation. I am a business looking to expand and move from office accomodation in Stafford, to Stone. Unfortunately there are no small office units available for such businesses, either for sale or rent. I'd like to see something similar to 'Enterprise HQ' and 'Enterprise Hub' in Coalport and Telford, which are ideal spaces both for co-working (rent a desk) or long term office rental. My As small and micro businesses make up a large proportion of the region's workforce and employers, it'd be great to see this reflected in 'small scale' office developments rather than just another influx of large single units. Adequate parking for such facilities is obviously a must!

(I had to comment on whether the plan for Stafford is 'sound' in order to give the above view.... I don't have an informed view on the whole plan just yet - just wanted to put forward views on this one point. Thanks

**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.**

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(I had to comment on whether the plan for Stafford is 'sound' in order to give the above view.... I don't have an informed view on the whole plan just yet - just wanted to put forward views on this one point.  
Thanks

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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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr Lufton
Comment ID	PS21
Response Date	31/01/13 17:42
Consultation Point	9 POLICY STAFFORD 2 ? NORTH OF STAFFORD ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Justified

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

**North of Stafford - Housing Allocation** The Borough Council is relying on a single allocation to the North of Stafford to deliver over two-fifths (43%) of the housing allocation for the whole town until 2031.

There is no evidence to show that this allocation is viable and it is a very high risk strategy to rely on a single development of this scale that can be controlled by a landowner and developer consortia.

**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.**



Delete Policy Stafford 2 North of Stafford and all the supporting text and justification.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr Lufton
Comment ID	PS22
Response Date	31/01/13 20:24
Consultation Point	7.27 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Justified

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

**North of Stafford - Transport** The access and transport strategy relating to the delivery of the major strategic development allocation North of Stafford is very general, vague and ill-defined and does not appeared to be supported by any substantive transport assessment or evidence.

**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.**

Delete Policy Stafford 2 North of Stafford and all the supporting text and justification.

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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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr Lufton
Comment ID	PS23
Response Date	01/02/13 10:05
Consultation Point	7.25 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Justified

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

**North of Stafford - Lack of Recognition of Existing Development** The north of Stafford allocation does not recognise or co-ordinate with the existing MoD development to the north of Beaconside. There is no suggestion or indication in the Plan how the strategic allocation would relate to the existing facilities that are on the boundary.

**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.**

Delete Policy Stafford 2 North of Stafford and all the supporting text and justification.

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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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr Lufton
Comment ID	PS24
Response Date	01/02/13 10:07
Consultation Point	9 POLICY STAFFORD 2 ? NORTH OF STAFFORD ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Justified

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

**North of Stafford - Historic Landscape Character** The north of Stafford is recognised as having a high value in terms of the recognition of historic landscape features and in particular evidence of mediaeval ridge and furrow. This is a feature of all the land to the south-west of Marstongate Farm.

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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

**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**

Delete Policy Stafford 2 North of Stafford and all the supporting text and justification.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr Lufton
Comment ID	PS25
Response Date	01/02/13 10:10
Consultation Point	7.28 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

**North of Stafford - Incursion into Open Countryside** The north of Stafford allocation represents a huge incursion into open countryside and lacks defensible boundaries to the north and east.

**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.**

Delete Policy Stafford 2 North of Stafford and all the supporting text and justification.



*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr Lufton
Comment ID	PS26
Response Date	01/02/13 10:15
Consultation Point	8 POLICY STAFFORD 1 ? STAFFORD TOWN ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Justified

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

**North of Stafford - Housing Allocation** The Borough Council is relying on a single allocation to the North of Stafford to deliver over two-fifths (43%) of the housing allocation for the whole town until 2031. There is no evidence to show that this allocation is viable and it is a very high risk strategy to rely on a single development of this scale that can be controlled by a landowner and developer consortia.

**North of Stafford - Transport** The access and transport strategy relating to the delivery of the major strategic development allocation North of Stafford is very general, vague and ill-defined and does not appear to be supported by any substantive transport assessment or evidence.

**North of Stafford - Historic Landscape Character** The north of Stafford is recognised as having a high value in terms of the recognition of historic landscape features and in particular evidence of mediaeval ridge and furrow. This is a feature of all the land to the south-west of Marstongate Farm.

**North of Stafford - Incursion into Open Countryside** The north of Stafford allocation represents a huge incursion into open countryside and lacks defensible boundaries to the north and east.

**North of Stafford - Lack of Recognition of Existing Development** The north of Stafford allocation does not recognise or co-ordinate with the existing MoD development to the North of Beaconside. There is no suggestion or indication in the Plan how the strategic allocation would relate to the MoD existing facilities that are on the boundary.

**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.**

Delete references to an allocation North of Stafford and all the supporting text and justification.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Lufton & Associates ( for Clarkes Farms, Weston Road)
Comment ID	PS27
Response Date	04/02/13 09:52
Consultation Point	2.8 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

The recognition of the needs for housing for military personnel in the town is supported. The MOD make an important contribution to the local economy, providing and supporting employment in the town and providing opportunities for local businesses.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Lufton & Associates ( for Clarkes Farms, Weston Road)
Comment ID	PS28
Response Date	04/02/13 09:54
Consultation Point	2.15 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

The recognition of the historic environment and its importance as an irreplaceable asset is not reflected in the development and allocation strategy. Land north of Stafford is recognised as having a high historic landscape value in the evidence of medieval ridge and furrow. There are a number of other potential directions for development around the town that would have less impact on the preservation of the historic environment and historic landscape features. Land to the north-east of Beaconside is not of high historic landscape value and provides a good opportunity to develop an extension to the town in a naturally enclosed landscape setting.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Lufton & Associates ( for Clarkes Farms, Weston Road)
Comment ID	PS29
Response Date	04/02/13 09:55
Consultation Point	4.1 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

Maximising access to services and reducing the need to travel. This objective is supported as a central tenet of creating sustainable development.

Development of land to the north-east of Beaconside provides an excellent opportunity to provide housing, education, local services and employment in close proximity.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	United Kingdom Independence Party (Mr E Stones)
Comment ID	PS30
Response Date	04/02/13 11:08
Consultation Point	8 POLICY STAFFORD 1 ? STAFFORD TOWN ( <a href="#">View</a> )
Status	Processed
Submission Type	Letter
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Effective

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

ii Deliver.... Phase 1 of the Eastern Distributor Road from Weston Road / Beaconside to Baswich Lane road Bridge at St Thomas

vi. Ensure that new developments are capable of providing safe and convenient access by ... private transport that addresses the needs of all

**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.**

Please state the timescale for this phase of the road and the proposed extension to Lichfield Road A513 and Cannock Road A34 as shown on the deposited Stafford Area inset plan.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	United Kingdom Independence Party (Mr E Stones)
Comment ID	PS31
Response Date	04/02/13 11:19
Consultation Point	22 Policy T1 ( <a href="#">View</a> )
Status	Processed
Submission Type	Letter
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Effective

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

g.... ensuring that all developments that generate significant traffic flows... must be located in close proximity to the primary road network... and should have adequate capacity to accommodate the development or can be improved or mitigated as part of the development.

**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.**

I assume that the word 'and' should read 'which'.

Please state, as the planning authority, what improvements and the timescale for completion within the local plan period are proposed to a) Cannock Road A34 between Queensville and its junction with Lichfield Road A513 at Weeping Cross and b) Tixall Road, Blackheath Lane and Baswich Lane, to accommodate the additional traffic flows generated by the proposed residential development a) at Falmouth Avenue and Baswich House, and b) to the west of Stafford Crematorium and to the south of Tixall Road.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr J Johnson
Comment ID	PS32
Response Date	02/02/13 11:58
Consultation Point	8 POLICY STAFFORD 1 ? STAFFORD TOWN ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Effective

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

Having regard for the Strategies put forward in the above mentioned document I have reservations whether they will be achievable in the time frame given. Trying to obtain funding from the utilities companies would be like trying to obtain blood from stones or the Taxman. The strategies put forward are on face value very good however the logistics of trying to achieve them in most cases are pie in the sky, for instance the Eastern town by-pass was pegged out over 40years ago, the University and the Fire Station were built with a view to access the Eastern town by-pass, within that time scale of 40years to present day there is still no sign of the by-pass being constructed, no doubt the same thing will happen to the Western by-pass especially around the Doxey/New town area and the Newport road areas. With the demise of the C.O.O.P and other outlets within the town it is evident that in order to achieve the strategies put forward a rapid and in depth rethink may have to be undertaken in an effort to attract potential developers and funding to Stafford, as a County Town we should be promoting our

assets but it seems we are losing most of them, Staffordshire University should remain in the county town, and while we will suffer the ups and downs of the HS2/3 passing through the County, the residents will receive no benefits at all from the upheaval it will cause. While we attract a number of small companies to the area the town needs to attract larger firms in an effort to reduce unemployment. The new home builds may be necessary but not at the expense of valuable farming land and the environment. It would appear that the council are more interested in building homes for which they receive an income from property taxes than they are in improving the infrastructure of the outlying towns and villages for which they have a duty of care to. So to sum up, the Strategies put forward although good may not be achievable, logistically with the exception of new builds not achievable.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Clarke Farms ( )
Comment ID	PS33
Response Date	04/02/13 19:25
Consultation Point	1 SPATIAL PRINCIPLE 1 (SP1) - PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

This principle is supported.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Clarke Farms ( )
Comment ID	PS34
Response Date	04/02/13 19:26
Consultation Point	2 SPATIAL PRINCIPLE 2 (SP2) ? STAFFORD BOROUGH HOUSING & EMPLOYMENT REQUIREMENTS ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

This policy objective of providing development land to provide 500 dwellings per year across the Borough is supported. In the light of evidence in relation to housing need, affordable housing requirements and market house prices it is suggested that land for 500 dwellings per annum is presented as a minimum requirement. Failure to deliver a sustainable level of new housing will have serious adverse implications for the prosperity, social and economic well-being of the residents of the Borough.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Clarke Farms ( )
Comment ID	PS35
Response Date	04/02/13 19:28
Consultation Point	3 SPATIAL PRINCIPLE 3 (SP3) ? STAFFORD BOROUGH SUSTAINABLE SETTLEMENT HIERARCHY ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

This principle is generally supported. It is agreed that housing and employment growth should be balanced and that the strategy should as far possible provide the conditions to develop a town with a high degree of self-containment in terms of housing, employment, schools and other education facilities and recreational and leisure facilities.

New housing development on land to the north-east of Beaconside provides an excellent opportunity to provide housing, education, local services and employment in close proximity.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Clarke Farms ( )
Comment ID	PS36
Response Date	04/02/13 19:29
Consultation Point	4 SPATIAL PRINCIPLE 4 (SP4) ? STAFFORD BOROUGH HOUSING GROWTH DISTRIBUTION ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

This principle is generally supported. The focus of housing growth in Stafford town is supported as a strategy that will be the most effective in achieving the Council's key planning and sustainable development objectives.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Clarke Farms ( )
Comment ID	PS37
Response Date	04/02/13 19:30
Consultation Point	6.52 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Justified

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

It is agreed that the SHLAA is a key evidence base to the strategy required by national policy. Although, the Borough Council has diligently produced the SHLAA on an annual basis a substantial proportion of the information put forward by landowners, agents and developers is out of date.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Clarke Farms ( )
Comment ID	PS38
Response Date	04/02/13 19:31
Consultation Point	8 POLICY STAFFORD 1 ? STAFFORD TOWN ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

The policy of providing development land to provide for 5,500 dwellings in the town up to 2031 is supported. Focussing the substantial majority of housing development in three strategic locations is not supported. There is a significant risk to the delivery of housing with reliance on these limited strategic locations particularly in relation to mitigating the impact on the highway network and providing funding for adequate education facilities.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Clarke Farms ( )
Comment ID	PS39
Response Date	04/02/13 19:37
Consultation Point	9 POLICY STAFFORD 2 ? NORTH OF STAFFORD ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

POLICY STAFFORD 2 - NORTH OF STAFFORD - Housing Allocation The Borough Council is relying on a single allocation to the North of Stafford to deliver over two-fifths (43%) of the housing allocation for the whole town until 2031.

There is no evidence to show that this allocation is viable and it is a high risk strategy to rely on such large development where housing delivery could be controlled by the landowner or a developer or developer consortia.

POLICY STAFFORD 2 - NORTH OF STAFFORD -Transport

The access and transport strategy relating to the delivery of the major strategic development allocation North of Stafford is not clearly defined or consistent with a robust delivery mechanism. There is little evidence to suggest that adequate transport modelling has been done to assess the impact of the

housing and employment allocations on the network. The Colin Buchanan Infrastructure Delivery Plan report, July 2012, indicates that the allocation North of Stafford has been predicated on an allocation of 2,000 dwellings and not 3,100 dwellings as now proposed.

#### POLICY STAFFORD 2 - NORTH OF STAFFORD - Historic Landscape Character

The north of Stafford is recognised as having a high value in terms of the recognition of historic landscape features and in particular evidence of medieval ridge and furrow. This is a feature of all the land to the south-west of Marstongate Farm.

By reducing the scale of the development allocation North of Stafford to 1,500 to 2,000 dwellings there would be an opportunity to avoid the loss of historic landscape features and mitigate against other environmental intrusion.

#### POLICY STAFFORD 2 - NORTH OF STAFFORD - Incursion into Open Countryside

The north of Stafford allocation represents an incursion into open countryside and lacks clearly defensible development boundaries to the north and east.

#### POLICY STAFFORD 2 - NORTH OF STAFFORD - Lack of Recognition of Existing Development

The north of Stafford development allocation does not recognise or co-ordinate with the existing MoD development to the North of Beaconside. There is no suggestion or indication in the Plan how the strategic allocation would relate to the existing MoD facilities that are on the boundary and that the allocation surrounds.

#### POLICY STAFFORD 2 - NORTH OF STAFFORD - Boundary Implications

The Initial Preferred Route for HS2 Phase 2 to Manchester is shown to pass within less than 200 metres of the northern boundary of the strategic allocation.

#### POLICY STAFFORD 2 - NORTH OF STAFFORD - Environment and Biological Importance

The Adopted Stafford Borough Local Plan Proposals Plan very clearly shows that land to the south of Marstongate Farm is an area of significant biological importance. This land provides a green lung for the town and should be regarded as a critical element of green infrastructure linking with Stafford Common and open land to the south of Beaconside.

A much more concerted effort should be made to protect this land from development and enhance the ecological and biological linkages across the ring road. Marston Brook is a natural water corridor to the east of Marston Lane which by the redrawing of the allocation boundary in the plan submission process has been incorporated into the strategic development allocation. The enlargement of the strategic allocation boundaries North of Stafford both east and west of Marston Brook and the considerable encroachment into the area of biological importance gives the community of Stafford no confidence that the Borough Council has properly considered how this development should be assimilated into its natural surroundings.

**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.**

Reduce the scale the development allocation North of Stafford to 1,500 to 2,000 dwellings with consequential amendment to the supporting text and justification. Provide a more comprehensive framework for the future development North of Stafford to demonstrate how it would integrate with existing employment and communities. Reduce the scale the development allocation North of Stafford to 1,500 to 2,000 dwellings and incorporate mitigation measures to reflect the biological importance of the site and its wider linkages. It is suggested an area of biological enhancement should be indicated on both sides of Marston Brook and an area for environmental improvement and recreation be identified to separate the allocated development areas by a minimum of 300m.

*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

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	Lufton & Assoc's for Clarke Farms ( )
<b>Comment ID</b>	PS40
<b>Response Date</b>	04/02/13 19:39
<b>Consultation Point</b>	10 POLICY STAFFORD 3 ? WEST OF STAFFORD ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

POLICY STAFFORD 3 - WEST OF STAFFORD - Transport There is limited information in the plan and supporting evidence (including the Colin Buchanan Infrastructure Delivery Plan report, July 2012) to suggest that funding and delivery mechanisms for the Western Access Improvement Scheme are robust and secure.

It is clear capital funding towards the Western Access Improvement Scheme has been rejected by government most recently under a major scheme bid to DfT at a time when the Borough was receiving considerable additional funding for infrastructure from DCLG with the town recognised as a "growth point". Without a much more robust funding mechanism being identified or a much greater contribution being secured from the developer it is difficult to envisage how the Western Access Improvement Scheme can be delivered and over what time period. At the best it would appear that development

west of Stafford should only be recognised as viable later in the plan period and beyond 2021 at the earliest.

#### POLICY STAFFORD 3 - WEST OF STAFFORD - Infrastructure

The policy under point xiii only refers to the delivery of phase 1 of Western Access Improvement Scheme whereas in other documents and in policy 1 Stafford Town it is clear the Borough Council is committed to a wider highway improvement scheme. Apart from allowing immediate access to the major site it is difficult to assess what phase 1 of the Western Access Improvement Scheme could achieve in isolation.

At the best it would appear that development west of Stafford should only be recognised as viable later in the plan period and beyond 2021 at the earliest.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Clarke Farms ( )
Comment ID	PS41
Response Date	04/02/13 19:47
Consultation Point	7.28 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Justified

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

The OS Plan and Concept Plan for North of Stafford are not consistent.

**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 scale the development allocation North of Stafford should be reduced to allow for the development of 1,500 to 2,000 dwellings and clearly incorporate mitigation measures to reflect the biological importance of the site and its wider linkages. It is suggested an area of biological enhancement should



be indicated on both sides of Marston Brook and an area for environmental improvement and recreation should be identified to separate the allocated development areas by a minimum of 300m.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Clarke Farms ( )
Comment ID	PS42
Response Date	05/02/13 18:28
Consultation Point	8 POLICY STAFFORD 1 ? STAFFORD TOWN ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Justified

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

POLICY STAFFORD 1 - STAFFORD TOWN - Housing The policy of providing development land to provide for 5,500 dwellings in the town up to 2031 is supported.

Development of land to the north-east of Beaconside provides an excellent opportunity to provide housing, education, local services and employment in close proximity. It is suggested a strategic development allocation should be identified north-east of Stafford on land south and west of Beacon Farm. This could provide for up to 1,000 new dwellings and be integrated with development on adjoining land under the control of the MOD.

POLICY STAFFORD 1 - STAFFORD TOWN - Employment

The support for the Science and Technology Park at Beaconside and support for development to allow for the MOD to retain their commitment to a military base in Stafford is welcomed.

There is clearly a good opportunity through the Core Strategy to support both the Science and Technology Park and the MOD by allocating land to the north-east of Beaconside for housing to provide mixed-use development with supporting local services in close proximity.

#### POLICY STAFFORD 1 - STAFFORD TOWN - Infrastructure

There is limited information in the plan and supporting evidence (including the Colin Buchanan Infrastructure Delivery Plan report, July 2012) to suggest that funding and delivery mechanisms for the Western Access Improvement Scheme or the Eastern Access Improvement Scheme are secure. It is further noted that the traffic modelling for the North of Stafford has been predicated on an allocation of 2,000 dwellings and not 3,100 dwellings as now proposed.

It is clear capital funding towards the Western Access Improvement Scheme has been rejected by government on a number of occasions most recently under a major scheme bid to DfT at a time when the Borough was receiving considerable additional funding for infrastructure from DCLG with the town recognised as a growth point. Without a much more robust funding mechanism being identified or a much greater contribution being secured from the developer it is difficult to envisage how the Western Access Improvement Scheme can be delivered and over what time period. At the best it would appear that development west of Stafford should only be recognised as viable later in the plan period and beyond 2021 at the earliest.

**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.**

New housing development on land to the north-east of Beaconside provides an excellent opportunity to provide housing, education, local services and employment in close proximity.

North-east of Stafford should be identified as a strategic development location for housing.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Clarke Farms ( )
Comment ID	PS43
Response Date	07/02/13 13:15
Consultation Point	8 POLICY STAFFORD 1 ? STAFFORD TOWN ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.2
Files	<a href="#">Beacon Farm Allocs Mapc.JPG</a> <a href="#">Land at Beacon Farm-2.pdf</a>

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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

POLICY STAFFORD 1 - STAFFORD TOWN - Housing

Focussing the substantial majority of housing development in three strategic locations is not supported. There is a significant risk to the delivery of housing with reliance on these limited strategic locations particularly in relation to mitigating the impact on the highway network and providing funding for adequate education facilities.

**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 Plan should include a strategic allocation NE of Beaconside. Development of land to the north-east of Beaconside provides an excellent opportunity to provide housing, education, local services and employment in close proximity. It is suggested a strategic development allocation should be identified north-east of Stafford on land south and west of Beacon Farm. This could provide for up to 1,000 new dwellings and be integrated with development on adjoining land under the control of the MOD.

A basic outline location plan has been submitted to the Council by post.

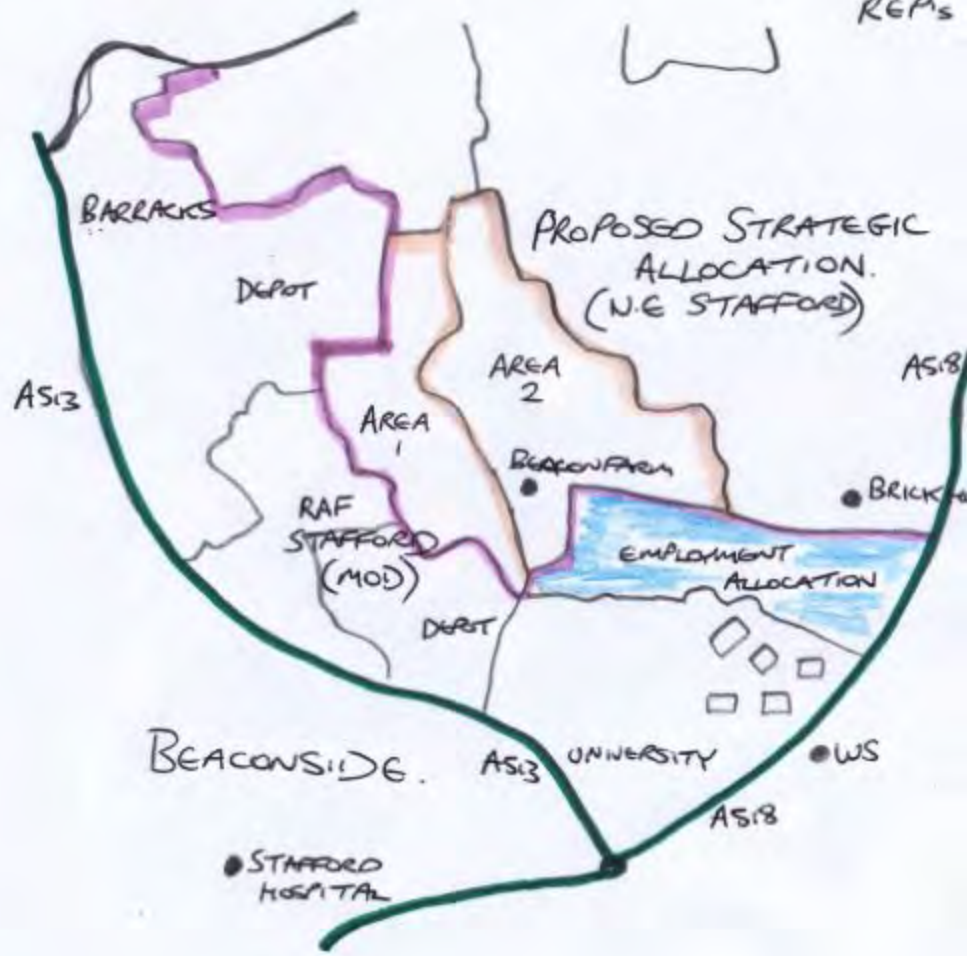
*Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation.*

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

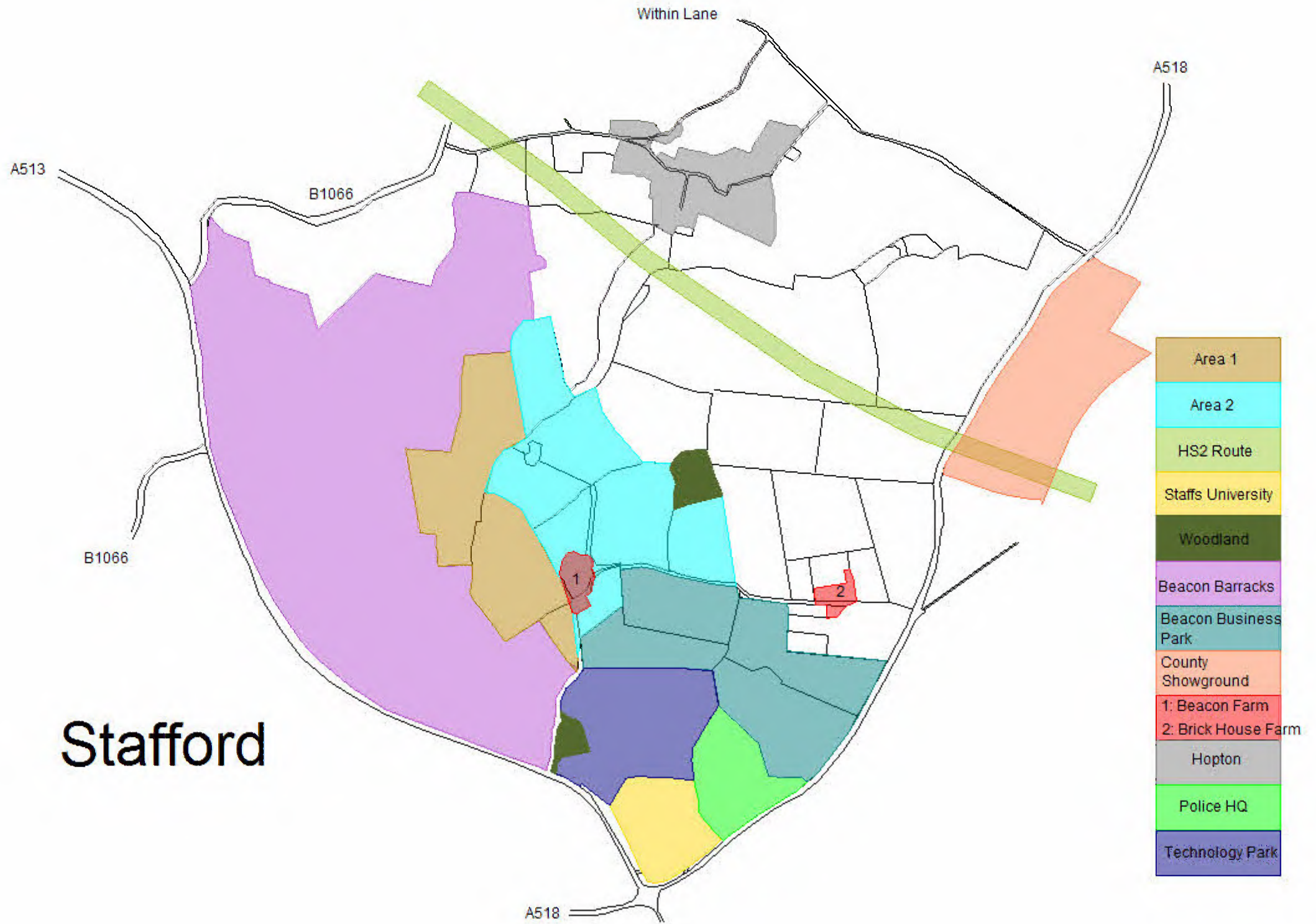
**If your representation is seeking a change, do you consider it necessary to participate at the Examination in Public?** Yes, I wish to participate at the examination in public

LOCATION PLAN: CLARKES FARMS  
BEALOW FARM  
REPs PS 43/44/5

PRE-SUBMISSION  
PLAN  
CONSULTATION.



POTENTIAL  
BOUNDARY OF  
STRATEGIC ALLOCATION  
1 AND 2



## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Clarke Farms ( )
Comment ID	PS44
Response Date	07/02/13 13:17
Consultation Point	7.4 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Justified

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

POLICY STAFFORD 1 - STAFFORD TOWN - Housing Focussing the substantial majority of housing development in three strategic locations is not supported. There is a significant risk to the delivery of housing with reliance on these limited strategic locations particularly in relation to mitigating the impact on the highway network and providing funding for adequate education facilities.

**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 Plan should include a strategic allocation NE of Beaconside. Development of land to the north-east of Beaconside provides an excellent opportunity to provide housing, education, local services and employment in close proximity. It is suggested a strategic development allocation should be identified north-east of Stafford on land south and west of Beacon Farm. This could provide for up to 1,000 new dwellings and be integrated with development on adjoining land under the control of the MOD.

A basic outline location plan has been submitted to the Council by post.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Clarke Farms ( )
Comment ID	PS45
Response Date	07/02/13 13:20
Consultation Point	7.8 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Justified

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

Focussing the substantial majority of housing development in three strategic locations is not supported. There is a significant risk to the delivery of housing with reliance on these limited strategic locations particularly in relation to mitigating the impact on the highway network and providing funding for adequate education facilities.

**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 Plan should include a strategic allocation NE of Beaconside. Development of land to the north-east of Beaconside provides an excellent opportunity to provide housing, education, local services and employment in close proximity. It is suggested a strategic development allocation should be identified north-east of Stafford on land south and west of Beacon Farm. This could provide for up to 1,000 new dwellings and be integrated with development on adjoining land under the control of the MOD.

A basic outline location plan has been submitted to the Council by post.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr John Leather
Comment ID	PS46
Response Date	08/02/13 17:36
Consultation Point	2.26 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

Working on a population of 2541 in Eccleshall this represents 2.1% of the whole borough and any allocation for employment should take into account the distribution of the workforce living in the borough and should not be having to face an over allocation of some 12.5%

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr John Leather
Comment ID	PS47
Response Date	08/02/13 17:27
Consultation Point	2.17 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

Although the transport and accessibility in parts of the Borough are good many of the rural areas are badly serviced and heavy vehicles are using roads which were not built for them. Further development encouraging greater use of unsuitable roads should be avoided.

**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.**

Locate industry to areas where there is satisfactory road access

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr John Leather
Comment ID	PS48
Response Date	08/02/13 17:20
Consultation Point	2.13 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

Why bother to build more when nearly one in eight employment buildings are empty?

**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 Above

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr John Leather
Comment ID	PS49
Response Date	08/02/13 17:17
Consultation Point	The Plan for Stafford Borough - Publication ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Effective

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

The allocation of employment land at Raleigh Hall is both unsound and unjustified. this was a residential area that had change of use by default many years ago in order to save the Council the cost of an inquiry against enforcement when it was being used illegally for Sunday open markets

When the additional area from the adjoining field was put forward for the development of the Biomass power station - which was then approved - the planning officer at the time confirmed that the form of development was a special case for renewable energy and that no further expansion of Raleigh Hall site would be allowed onto Agricultural Land

Access to Raleigh Hall is completely unsatisfactory for the use by large lorries due to the restricted width of the Stafford to Eccleshall Road, Stafford Street and Castle Street through Eccleshall and the narrow 'C' class road from the A519 to Raleigh Hall site. The detrimental effect from the marks %

Spencer and Gist to the town of Eccleshall, which is a historic conservation area, is already un-acceptable and any further development creating any additional traffic should not be considered.

**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.**

To re-consider the allocation in this area as it does not and will not contribute to the immediate area and as shown is not as stated as the field in question is only 4 hectares not 6 hectares due to the area already developed for the biomass plant and Underwoods farm.

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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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr John Leather
Comment ID	PS50
Response Date	08/02/13 19:08
Consultation Point	5.2 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

reference to point 5 - the allocation at raleigh hall does not mitigate adverse effects - it creates adverse effects in relation to encroachment into good agricultural land and effects of heavy traffic on country roads

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr John Leather
Comment ID	PS51
Response Date	08/02/13 19:11
Consultation Point	6.28 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Effective

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

As stated Eccleshall is an historic Conservation area and therefore should not have additional unacceptable heavy goods vehicles passing through due to the proposed additional industrial development at Raleigh hall

**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.**

allocate industry closer to where there are the employment needs.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr John Leather
Comment ID	PS52
Response Date	08/02/13 19:12
Consultation Point	5 SPATIAL PRINCIPLE 5 (SP5) ? STAFFORD BOROUGH EMPLOYMENT GROWTH DISTRIBUTION ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Justified

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

The plan states that an allocation of 32% of employment land should go to the 'rest of the borough' being 12.5% to each of Raleigh Hall and Ladford fields. And with 56% to Stafford and 12% to Stone. This seems completely out of proportion compared with the housing allocation of 72% to Stafford, 8% to Stone and 20% to the 'rest of the borough'. Working on population alone Eccleshall (2541) represents only 2.1% of the whole borough and in order to save un-necessary commuting surely the employment areas should be where there is the population live. The proposals for both Raleigh Hall and Ladford fields do not meet these criteria

**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 allocation of development for employment and heavy industry should be close to where the workforce live

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr John Leather
Comment ID	PS53
Response Date	08/02/13 19:12
Consultation Point	14 Policy E1 ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Justified

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

reference to point 'e' - I agree that the development should be within the RIE - Not outside and being a major expansion as in the cases of Raleigh hall and Ladfordfields

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr John Leather
Comment ID	PS54
Response Date	08/02/13 19:13
Consultation Point	15 Policy E2 ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Justified

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

reference to (i) - i agree that the development should be on RIE's not on land adjoining

Reference point(c) - development should compliment and not prejudice agricultural operations

Reference point (g) - Should not be detrimental to the area

Reference rural areas point (e) - Should be designed to be in keeping with its surroundings

Raleigh Hall proposal is not on an RIE, it does not compliment agriculture, it does prejudice the agricultural use of the land, any development will be detrimental to the area and can not be satisfactorily landscaped and would not be in keeping with the surroundings

**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.**

Reconsider the proposed allocation

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr John Leather
Comment ID	PS55
Response Date	08/02/13 19:13
Consultation Point	9.12 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

the plan says that any further development should not impact on the neighbourhood, however the area chosen could not be satisfactorily landscaped. Promises in the past about impact and landscaping in relation to the refrigerated distribution building were never fulfilled and is an eyesore to the area. Similarly promises from the planning officers about the Bipomass plant are still un-fulfilled - it is not fully landscaped. it was said there would be no noise, no smell and no smoke - these all still present and until the pollution problem is solved and running satisfactorily in accordance with the promises made by the planners and developers then no further development should be allowed in the area.

**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.**

Get the existing site working within the regulations before considering any further intrusion into the countryside.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr John Leather
Comment ID	PS56
Response Date	08/02/13 19:13
Consultation Point	9.13 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

see comments under 9.13

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr John Leather
Comment ID	PS57
Response Date	08/02/13 19:14
Consultation Point	16 Policy E3 ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

Proposed industrial uses are not suitable for rural locations where the transport problems would be made worse by additional HGV's

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr John Leather
Comment ID	PS58
Response Date	08/02/13 19:14
Consultation Point	9.15 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

See comments under 9.12

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr John Leather
Comment ID	PS59
Response Date	08/02/13 19:15
Consultation Point	17 Policy E4 ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Justified  
. Effective

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

The plan states that the area available is 6 Hectares - this is not correct - the biomass plant and Underwoods farm take a large area of the field as shown on the Plan . the actual area available is only 4 hectares and would not contribute satisfactorily to pay for the additional infrastructure that would be necessary

Any further development must be delayed until the traffic problems through Eccleshall are resolved and even if HGV's had to travel north along A519 and not south then there is still a problem at Mill Meece where the road has extreme corners to cross the railway bridge - large lorries already run off the road onto the kerbs and verge . also it should be remembered that there has already been one fatality with a lorry driving through the bridge and landing on the railtrack.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr John Leather
Comment ID	PS60
Response Date	08/02/13 19:15
Consultation Point	9.16 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Justified  
. Effective

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

it is wrong to say that both sites have good access

Neither site has good access - the Stafford - Eccleshall road is not suitable for increased use of HGV's

Eccleshall Town is being clogged by too many existing HGV's

both sites have poor access over bending country roads

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr John Leather
Comment ID	PS61
Response Date	08/02/13 19:15
Consultation Point	9.17 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Justified  
. Effective

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

The area stated is wrong - the area of the field at present available is about 4 hectares

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr Lufton
Comment ID	PS62
Response Date	12/02/13 21:17
Consultation Point	6.28 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

The recognition of Eccleshall as a key service village providing services to a wider rural population is supported. The village has a good range of services, facilities and local shops as well as a good leisure and recreational offer.

Eccleshall should be regarded as one of the most important of the 'key villages' and local housing needs should be recognised with an appropriate scale of residential development. The village will only secure significant homes affordable to local people on low incomes if market housing development is secured.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr Lufton
Comment ID	PS63
Response Date	12/02/13 21:20
Consultation Point	6.29 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

The recognition of Gnosall as a key service village providing services to a wider rural population is supported. The village has a good range of services, facilities and local shops. Gnosall should be regarded as suitable for new residential development with local housing needs recognised with an appropriate scale of residential development. The village will only secure significant homes affordable to local people on low incomes if market housing development is secured.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr Lufton
Comment ID	PS64
Response Date	12/02/13 21:25
Consultation Point	6.32 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

The recognition of Great Haywood as a key service village providing services to a wider rural population is supported. The village has a good range of services, facilities and local shops. The proposed alignment of the Phase 2 HS2 line along with other significant constraints and natural features will the direction of growth is limited. Great Haywood should be regarded as suitable for new residential development with local housing needs recognised with an appropriate scale of residential development. The village will only secure significant homes affordable to local people on low incomes if market housing development is secured. The most appropriate direction would appear to be the north of the village where the HS2 alignment would form a new defensible boundary. While it is recognised that HS2 may cross the WCML on a viaduct there still remains an opportunity for development with extensive and appropriate landscape mitigation.

*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

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	Waste Water Strategy, Severn Trent Water (Mr Paul Hurcombe)
Comment ID	PS65
Response Date	12/02/13 15:04
Consultation Point	The Plan for Stafford Borough - Publication ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.7

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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

**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.**

Severn Trent Water has a duty to provide additional sewerage and sewage treatment capacity to accommodate new development. As part of the regulatory framework with Ofwat, investment required to provide additional capacity on the existing sewerage system and at sewage treatment works is funded through customers' bills across the entire Severn Trent customer base. Consequently there is a requirement to manage existing capacity and provide future capacity as required to minimise impact on customers' bills. In light of this, we are aware that the new Plan covers the period 2011 to 2031 and so capacity improvements will need to be phased to coincide with timing and construction of development. Initial assessments indicates that 5.2m will need to be spent across Stafford by 2031 to accommodate proposed development, however the timing of the capacity improvements will depend on the location, timing and construction programme for each site. Whilst the pre-submission document tries to provide detailed information on infrastructure provision there is still uncertainty over actual

expenditure per development area. To ensure sewerage capacity is available Severn Trent have promoted an investment project and allocated 5.2m of funding to provide additional capacity but no "showstoppers" are envisaged based on the development

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Waste Water Strategy, Severn Trent Water (Mr Paul Hurcombe)
Comment ID	PS66
Response Date	12/02/13 15:04
Consultation Point	7.21 Paragraph ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.6

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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

**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.**

**Revised:** A key consideration in terms of new housing development in Stafford is the provision of additional foul sewerage capacity to accommodate new development flows. Large parts of the Stafford sewerage system were originally designed to accept both foul and storm water in the same pipe, and during heavy rainfall the capacity in parts of the sewerage system can be exceeded resulting in localised sewer flooding. To ensure the additional development flows do not increase flood risk, it is envisaged that some localised sewer capacity improvements will be required to provide additional capacity to coincide with development construction. In addition to localised capacity improvements, further strategic capacity improvements will be required at Lammascote sewage pumping station, which pumps the majority of sewage flows from the north, west and city centre direct to Brancote sewage treatment works. Severn Trent have advised that whilst there is some limited capacity at Lammascote there will

need to be more extensive sewerage capacity improvements to accommodate medium to long term development. More detailed hydraulic sewer modelling is currently ongoing to identify the scope of sewerage improvement work to meet the new housing development being allocated across Stafford.



## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Waste Water Strategy, Severn Trent Water (Mr Paul Hurcombe)
Comment ID	PS67
Response Date	12/02/13 15:04
Consultation Point	8.19 Paragraph ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

**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.**

**Revised :** An important consideration in terms of new residential development at Stone will be the potential impact of additional foul water flows on the current sewerage system. During times of heavy rainfall the capacity in parts of the sewerage system can be exceeded resulting in localised sewer flooding. Depending on the location of development additional sewerage capacity may be required to reduce flood risk. New development to the west of Stone will drain via an existing sewage pumping station at Westbridge Park where capacity assessments will be required to determine whether capacity are required. Any capacity improvements will need to coincide with development construction.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Waste Water Strategy, Severn Trent Water (Mr Paul Hurcombe)
Comment ID	PS68
Response Date	12/02/13 15:04
Consultation Point	8.25 Paragraph ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

**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.**

**Revised:** No Change

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Waste Water Strategy, Severn Trent Water (Mr Paul Hurcombe)
Comment ID	PS69
Response Date	12/02/13 15:04
Consultation Point	13.12 Paragraph ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

**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.**

**Revised:** Waste Water - Sewerage capacity improvements will be required to accommodate development in all three SDLs in Stafford. Severn Trent has already allocated funding to pay for these capacity improvements with timing of improvement work to be phased to coincide with development phasing. Investment is already underway at Brancote sewerage treatment works to accommodate development in Stafford. Subject to more detailed hydraulic modelling waste water capacity improvements are not envisaged to accommodate the proposed level of development in Stone, however should this be required a lead in time of 2-3 years may be required depending on the extend of the required improvements. All capacity improvements will be funded by Severn Trent Water.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Waste Water Strategy, Severn Trent Water (Mr Paul Hurcombe)
Comment ID	PS70
Response Date	12/02/13 15:04
Consultation Point	13.24 Paragraph ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

**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 table indicates that 0.9m will need to be spent across Stafford. Initial estimates indicate that in total 5.2m of sewerage capacity improvements will be required across to accommodate the SDLs in Stafford. This funding has been allocated within the investment programme to timing of this expenditure will be dependant on when, where and at the rate of development in each of the three SDLs. Work is also planned to provide strategic capacity for the north and west SDLs by undertaking capacity improvements at Lammascote sewage pumping station. More detailed hydraulic modelling will be undertaken as and when development sites come forward through the planning process. As funding has been set aside by Severn Trent to accommodate development capacity need and further work is required to determine the final split across each SDL it is not appropriate to break this funding down to each specific development area.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Waste Water Strategy, Severn Trent Water (Mr Paul Hurcombe)
Comment ID	PS71
Response Date	12/02/13 15:04
Consultation Point	19 Appendix D- Infrastructure ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

**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.**

**Appendix D (Page 150) - Stafford Town North Infrastructure Requirements** Notional modelling indicates that sewerage capacity improvements will be required to accommodate the additional foul flows from sites to the north of Stafford. Initial estimates indicate that in total 5.2m of sewerage capacity improvements will be required across to accommodate the SDLs in Stafford. This funding has been allocated within the investment programme to timing of this expenditure will be dependant on when, where and at the rate of development in each of the three SDLs. Work is also planned to provide strategic capacity for the north and west SDLs by undertaking capacity improvements at Lammascote sewage pumping station. More detailed hydraulic modelling will be undertaken as and when development sites come forward through the planning process. As funding has been set aside by Severn Trent to

accommodate development capacity need and further work is required to determine the final split across each SDL it is not appropriate to break this funding down to each specific development area.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Waste Water Strategy, Severn Trent Water (Mr Paul Hurcombe)
Comment ID	PS72
Response Date	12/02/13 15:04
Consultation Point	19 Appendix D- Infrastructure ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

**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.**

**Appendix D (Page 152) - Stafford Town West Infrastructure Requirements** Notional modelling indicates that sewerage capacity improvements will be required to accommodate the additional foul flows from sites to the north of Stafford. Initial estimates indicate that in total 5.2m of sewerage capacity improvements will be required across to accommodate the SDLs in Stafford. This funding has been allocated within the investment programme to timing of this expenditure will be dependant on when, where and at the rate of development in each of the three SDLs. Work is also planned to provide strategic capacity for the north and west SDLs by undertaking capacity improvements at Lammascote sewage pumping station. More detailed hydraulic modelling will be undertaken as and when development sites come forward through the planning process. As funding has been set aside by Severn Trent to

accommodate development capacity need and further work is required to determine the final split across each SDL it is not appropriate to break this funding down to each specific development area.



## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Waste Water Strategy, Severn Trent Water (Mr Paul Hurcombe)
Comment ID	PS73
Response Date	12/02/13 15:04
Consultation Point	19 Appendix D- Infrastructure ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

**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.**

**Appendix D (Page 154) - Stafford Town East Infrastructure Requirements** Notional modelling indicates that sewerage capacity improvements will be required to accommodate the additional foul flows from sites to the north of Stafford. Initial estimates indicate that in total 5.2m of sewerage capacity improvements will be required across to accommodate the SDLs in Stafford. This funding has been allocated within the investment programme to timing of this expenditure will be dependant on when, where and at the rate of development in each of the three SDLs. Work is also planned to provide strategic capacity for the north and west SDLs by undertaking capacity improvements at Lammascote sewage pumping station. More detailed hydraulic modelling will be undertaken as and when development sites come forward through the planning process. As funding has been set aside by Severn Trent to

accommodate development capacity need and further work is required to determine the final split across each SDL it is not appropriate to break this funding down to each specific development area.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Waste Water Strategy, Severn Trent Water (Mr Paul Hurcombe)
Comment ID	PS74
Response Date	12/02/13 15:04
Consultation Point	19 Appendix D- Infrastructure ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

**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.**

**Appendix D (Page 155) - Stone Town West and South Infrastructure Requirements** The proposed housing development to the west of Stone lies within the sewerage catchment that drains to an existing sewage pumping station at Westbridge Park. Severn Trent have indicated that whilst more detailed hydraulic modelling will be required to assess sewerage capacity, the additional foul only flows from 500 dwellings is not expected to have significant impact on sewer capacity. Should modelling indicate additional capacity is required then this will be funded by Severn Trent and planned to coincide with development phasing. Capacity issues are not envisaged with the proposed employment site due to the proximity to the sewage treatment works.

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	Mr Lufton
Comment ID	PS75
Response Date	14/02/13 21:00
Consultation Point	6.28 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

Modest housing development in Eccleshall is vital to provide for local and affordable housing need and maintain a vital and vibrant community.

In terms of possible directions for a sustainable extension to the village it should be recognised that there is limited land to the north inside the recognised floodplain of the river Sow. Another constraint in the north-west is the presence of Eccleshall Castle and significant historical landscape features.

Development to the west of the village is constrained with access only from narrow country lanes or through already long estate roads and there may also be a local objection in joining Elford Heath to the village.

Staffordshire County Council has recently done extensive survey and analysis in relation to historic landscape character to support the Submission Plan. The higher level sensitivity analysis indicates most of land to the east of Eccleshall is of high sensitivity. Land to the south is low and land to the

west and north is identified as of medium sensitivity. Extensive tracts of land in the Borough are recognised as being of "high sensitivity" in terms of historic landscape character and this indeed applies to areas that have been designated as strategic development allocations in the Submission Plan. It is therefore by no means an absolute constraint. In other assessment the historic landscape to the east of Eccleshall is recorded less high than the landscape to the north, south and west. The Historic Environment Character Assessment (HECA) for Eccleshall produced by the County Council and English Heritage for the Borough Council in August 2009 scores the value of the East of Eccleshall landscape zone as 9, with the south 10, the north 16 and Elford Heath to the west 12.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	The Coal Authority ( Rachael Bust)
Comment ID	PS76
Response Date	14/02/13 15:35
Consultation Point	The Plan for Stafford Borough - Publication ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

Thank you for consulting The Coal Authority on the above.

From earlier consultations you will be aware that a small area within the North of the Borough contains coal resources which are capable of extraction by surface mining operations. The remainder of the Borough is underlain by deep coal resources which have been investigated previously for extraction, but to date the potential has not been exploited.

You will also recall that a very small area of Stafford has been subjected to coal mining which will have left a legacy. Within Stafford Borough, the legacy issues are not extensive; for example there are only three recorded mine entries within the Borough. The Strategic Policy Choices consulted on previously did not appear to create any impact on these areas and the Publication Plan does not raise any fundamental issues associated with the interests of The Coal Authority.

Taking into account the above, The Coal Authority continues to have no specific comments to make on the Plan for Stafford Borough. Should you require any assistance please contact a member of Planning and Local Authority Liaison at The Coal Authority on our direct line.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr Marshall Fear
Comment ID	PS77
Response Date	15/02/13 15:22
Consultation Point	24 Policy C1 ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

The wording "New housing must provide an appropriate mix of dwelling types, tenures and sizes including a proportion of affordable housing" needs qualifying further to avoid conflict when developers offer certain types of affordable housing (house types) that do not reflect the overall mix of house types on the overall site. The document needs to be more specific. The wording should say that the % of 1 and 2 bed apartments, and 1,2 3 and 4 bed houses should reflect the property type mix across the whole site.

The document should also be more specific about the level of tenure types required for the affordable housing i.e What % of intermediate properties and what% level of affordable rented units. Also needs a more detailed definition of what types of products are classed as intermediate. For Example, Discount Market (75% of entry level Market Value), Shared Ownership, Shared Equity



**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 Mix of Affordable Housing **Property Types** will reflect the % of property types across the whole of the development site and are to be approved by the council

The Mix of Affordable **Tenure Types** will reflect the following (75% Social/Affordable Rent Units 25% Intermediate Units) and are to be approved by the council

Open market units - means those dwellings to be constructed on the the site pursuant to the planning permission for sale on the open market but excluding Affordable dwellings

Social/affordable rented units - means those affordable dwellings which will be owned and managed by a Registered Provider and which will be let on a social or affordable rent only basis.

Intermediate Housing Units - Means those Affordable dwellings which are not social/affordable rented units and which will be provided at a price below the market value through one or more of the following:-

- . Shared Ownership Units
- . Shared Equity Units
- . Discount Market Units (75% of entry level Market Value),

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr Marshall Fear
Comment ID	PS78
Response Date	15/02/13 15:25
Consultation Point	25 ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Broad Eye Windmill (Stafford) (Mrs J Lindores)
Comment ID	PS79
Response Date	18/01/13 15:02
Consultation Point	8 POLICY STAFFORD 1 ? STAFFORD TOWN ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

We at the mill have recently received a letter from the Borough Council telling us about the Publication of the Plan for Stafford Borough which can be viewed on the internet. Some of us have looked on the internet and have found that although there are references to places like The High House and Victoria Park, there is no reference to the Mill which is a well known visual landmark in the town.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Action Parkside (Mr Gerald D'Arcy)
Comment ID	PS80
Response Date	12/02/13 11:28
Consultation Point	9 POLICY STAFFORD 2 ? NORTH OF STAFFORD ( <a href="#">View</a> )
Status	Processed
Submission Type	Letter
Version	0.5
Files	<a href="#">action parkside response.pdf</a>

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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Effective

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

Speaking on behalf of Action Parkside, I consider "The Plan for Stafford Borough" to be unsound in terms of effectiveness in two major elements. 1) The infrastructure delivery planning will not meet the required needs, as I have indicated in detail in my letter. 2) The resource use objectives of sustainability are unlikely to be achieved, again for the reasons detailed in my letter.

Gerald D'Arcy

Tel. 01785 244941

Mob. 07904 380760

<gerald@darcy.myzen.co.uk>

11 Fairoak Avenue,  
Stafford.  
ST16 1LT

10th February, 2013

## **ACTION PARKSIDE!**

**The residents' association for the Parkside Estate**

Head of Planning & Regeneration Services,  
Stafford Borough Council,  
Civic Centre, Riverside,  
STAFFORD. ST16 3AQ



Dear Sir,

### **Plan for Stafford Borough – Publication (presubmission)**

#### **Traffic Management (section 10 of Consultation Document)**

##### 'Improved Transport Corridor'

On the plans as shown on the Pegasus illustration for development north of Beaconside, this improvement only goes as far as the SW corner of MOD no.4 site. This is insufficient. It should continue as dual carriageway at least as far as the junction with the Sandon Road B5066 going south (just north of the main MOD entrance.) Reason; The main track for domestic car traffic from the eastern part of the development (straddling Sandon Road to the north of Beaconside) into the town centre will be down the Sandon Road, using that part of Beaconside between the two junctions with Sandon Road. This will mean heavy usage on this section. Much of the car traffic from the middle part of the new development will also use this route into town as the most direct route.

In addition, the extra traffic from the MOD development of 400 properties will put extra pressure on the junction of Beaconside and Sandon Road (south).

Further, the development of 600 homes to the east of Stafford will provide further traffic flows on Beaconside as the main route between these homes and the M6 motorway.

Yet further traffic on Beaconside will be created by access to the new local centre which is indicated to be in the central development. Residents from HP13 and HP13 extension and from the development either side of the Sandon Road, will have to use Beaconside to gain access to shops or other facilities at this point.

#### Beaconside as a major arterial route; need for dual carriageway.

Major route for all three blue-light services.

Industrial / commercial developments at each end –

from Prime Point in the west to the Technology Park and Weston Road in the east

Residential developments at each end,

from the Cresswell Farm Estate (west) to land around the crematorium (east)

Main access for Staffordshire University, Stafford campus from north.  
 Main access for Mid Staffs Hospital from north of town and from M6  
 Main access for MOD Stafford, for both active units and for families.  
 Through traffic between M6 and M1 via Uttoxeter and A50.  
 Leisure traffic between M6 and Alton Towers.

#### Housing development - Junction on A34

It is imperative that the access into the housing development on the east side of the A34 should line up with the access to the commercial development on the west side of the A34 so as to avoid two junctions in close proximity. A roundabout would be preferable to traffic lights on this fast stretch.

#### Access to HP13 from Beaconside

The western access to HP13 is in line with the western end of Parkside Avenue. One set of traffic lights will serve both estates. Good! The eastern access to HP13 is not in line with the eastern end of Parkside Avenue. Bad! On Axel Noble plans, this meant a separate set of traffic lights at each of these two access points. This means 3 sets of lights within a short length. Ian Miller, who was then working for Axel Noble, said that it took three hours to run the computer programme which provided a model for traffic flow in this situation in this short stretch of road. Solution: move the eastern access to HP13 to the east to put it in line with the eastern end of Parkside Avenue. This may mean going beyond the bounds of HP13 as already approved but, as further approval is gained, this will become possible and will clearly improve the situation by removing the need for one set of traffic lights. This will also improve the severance issue between Parkside and HP13 as noted in section 7.27 by providing two direct links between the two estates.

#### Junction with Beaconside of Common Road (to the south) and Marston Lane (to the north).

At present, it is already difficult and dangerous to turn right out of both of these two roads. With the extra traffic from the new housing, this junction will need traffic lights. If Marston Lane were modified to join Beaconside in line with Common Road, the lights could control access to both.

#### Junction of Beaconside and Paton Drive

There are already a traffic lights at this junction and the road has a separation to allow right-turning traffic. The access to the local centre indicated immediately to the north of Beaconside and the main access to the middle part of the new development should be in line with Paton Drive to make use of these traffic lights with amendments as necessary.

#### Junction of Beaconside and Tollgate Drive

As with Common Road, it is already difficult and dangerous to turn right out of Tollgate Drive, partly because of the poor visibility due to the ongoing bend on Beaconside. Traffic lights will be needed here; additionally so due to the ambulance traffic from the station on the Tollgate Estate.

#### Overview of traffic management on Beaconside

Dual carriageway at least as far as Sandon Road (south) B5066

Traffic lights at;

Parkside Avenue/HP13 west

Parkside Avenue/HP13 east

Common Road/Marston Lane

Paton Drive/middle section of new development. Present lights will need amendments

Tollgate Drive

Sandon Road (north) B5066

Sandon Road (south) B5066 already in position

### Traffic flows towards the town centre

Much traffic will be generated from the three parts of the new development into the town centre, plus MOD personnel/families, either going to the major supermarkets, the town centre car parks, the leisure centre or the railway station. From the new development north of HP13, the most direct route into town will be down the A34 Stone Road. For the middle and eastern sections of the new development and from the MOD site, traffic will take the shortest route, either via Common Road or, more likely, via Sandon Road. This will create massive bottlenecks at three points; a) at the traffic light controlled junction with Corporation Street, b) at the mini roundabout junction with Browning Street and c) at the junction with Gaol Road and Gaol Square. Gaol Square is already heavily congested and a solution will need to be found to avoid total grid lock at this point. Remember, this is the most direct route to all three (plus 1 to come) supermarkets. Even if a major supermarket is planned for at the new local centre, it will not prevent this flow of traffic into the town centre.

**The flow of traffic indicated above and the effect on Gaol Square shows a direct link between the development to the north of Stafford and the need for the Stafford West Access Improvement.**

### **Pedestrians and Cyclists**

At each traffic controlled junction as indicated and at all other junctions, priority must be given to sympathetic pedestrian and cycle access. Pedestrians should be able to cross both carriageways in one movement instead of being trapped on a refuge between opposing streams of heavy and fast moving traffic. Safety railings giving the effect of animal pens should be avoided at all points in favour of raised ground works.

### **Public Transport**

In Section 7 of the Consultation document, blue section 9, viii, there is a note for the need for connections between the SDL and the town centre. At xiii, there is a mention of bus priority routes along the A34. The mention of the A34 seems to ignore the fact that, from the main parts of the residential developments, the direct route will be down the Sandon Road.

At 9 iii, there is a mention of the need for connections across the A34. In fact, as well as new connections with the town centre along the spokes of the wheel, **there is a need for a peripheral bus service linking the two ends of Beaconside and beyond**, from the Cresswell Farm Estate in the west, near to the M6 junction 14, across to the new development around the Crematorium. This would provide links to both Prime Point and to the technology park as well as to the University and the hospital.

### **Education**

On the Pegasus illustrated leaflet, there is an indication of three primary schools but there is no indication of a secondary school. In The Plan for Stafford Borough, [blue section 9 under 'Design' (x)] there is mention of a 'neighbourhood approach', including secondary education provision. The lack of a secondary school argues against this. The reliance on present or extended secondary schools means that the new developments will not be self sufficient and there will be the need for a greater number of journeys across Beaconside.

### **Health**

As with Education, the reliance on health facilities off site from the development means a lack of self-containment and an increased number of journeys which argues against the principle stated in Design (x). The reliance on the yet to be developed Browning Street Surgery seems over confident with the extra work which this centre will have from the proposed residential units around it.

### **Sport**

In 5.1 b there is the intention to provide *high quality designed developments including recreation, open space and sport provision*. On the Pegasus plans, there is open space but there is no indication of sports fields for recreation or of enclosed sports facilities. Lack of such facilities will mean yet more car journeys.

### **Climate Change**

At 4.1 bullet point 5, there is reference to the problem of climate change. Lack of facilities as indicated above for a secondary school, for heath provision or for sport facilities on site will all create extra, avoidable car journeys and further CO<sup>2</sup> pollution and so will exacerbate the problem of climate change.

### **Sustainable Urban Drainage Scheme (SUDS)**

SUDS will be mandatory from April 2014 for developments of more than one home, i.e. prior to housing appearing on the proposed sites. Such schemes require provision for 'annual' events, for '10 year' events and for '100 year' events. The proposed Marston Brook Flood Storage Area appears to address the 10 year event but there is no obvious provision for the 100 year event. It is recommended that such provision would be in the form of specially constructed drainage channels. Recommendation: Construct a drainage channel below and along the length of The Isabel Trail from the point where the Marston Brook crosses the former railway line down to Doxey Marshes. At times of very high rainfall, this would divert water from the lower part of the Marston Brook, so avoiding the ongoing problem of flooding at the junction of Sandon Road and Freeman Street. Instead of discharging into the River Sow via Kingsmead, the flood discharge would then be held in Doxey Marshes which provide a ready made storage area. This solution provides a route with a ready made fall of around 1 in 4 with no disturbance to dwellings, to commercial premises or to traffic. As such, it is economically favourable compared to other alternatives.

### **Green Infrastructure**

Green aspects, existing hedges, planting and amenities as shown on the plans need to be kept through the outline planning stage and into the sale of the land on to a new, as yet unknown, builders/developers. These need to be required conditions in any planning approval.

### **Consultation with Local Groups**

At 3.14, there is reference to the importance of Local Groups as stated in the Localism Act. We wish that Action Parkside be registered as a 'neighbourhood forum' and that we be fully included in all future consultation regarding plans for the north of Stafford.

Yours sincerely,

  
Gerald D'Arcy

Chairman - **Action Parkside**

Tel. 01785 244941 and 07904 380760

[gerald@darcy.myzen.co.uk](mailto:gerald@darcy.myzen.co.uk)

Planning spokesman – Ken Dartford

Tel. 01785 248511 and 07951183213

[ken.dartford@btinternet.com](mailto:ken.dartford@btinternet.com)



## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	Keep Westbridge Park Green ( )
Comment ID	PS81
Response Date	18/02/13 11:30
Consultation Point	12 POLICY STONE 1 ? STONE TOWN ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.5

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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

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

Policy STONE 1 includes under the heading "Stone Town Centre", point a, "**provision of mixed use development at Westbridge Park**". KWPG objects to this provision because it is not justified anywhere in the Local Plan or its evidence base and the site is not defined anywhere. The site does not appear in the Key Diagram, the Concept Diagram, the plan showing strategic development sites or on the Proposals Map and Westbridge Park itself is designated in its entirety as Green Infrastructure. In this respect the Local Plan is imprecise and internally inconsistent. There is no explanation or justification in the Plan for the mixed use proposal and the term is not explained or defined. The site is not discussed in the employment chapter and provision is made for employment elsewhere in the town. Similarly it is not suitable for housing, being in the flood plain, and is not shown as a housing site in the Plan. The Stone chapter states that there is retail capacity at Stone and need for new supermarket provision by 2015. However, paragraph 8.14 states that "there are no specific proposals to provide for this provision", adding "In line with the National Planning Policy Framework, the focus of new development should be

at Stone town centre with sites considered through a sequential approach". The Council is carrying out a concurrent consultation on sketch proposals for a new supermarket development on the northern part of Westbridge Park which is intended to fund a new leisure centre. Although the Local Plan's text states that no provision is being made for further retail development it is hard to resist the conclusion that the mixed use allocation is being added in a disingenuous manner to facilitate this development of the Council's own land. KWPG disputes the need for additional retail floorspace in the form of a new supermarket if that is the Local Plan's intention. Further, the Council's consultation leaflet states "if there is no public support for a food store in this location it is likely that a food store will go elsewhere in Stone" which clearly implies that the Council is aware of other suitable retail sites. The Local Plan should not rely on a non-statutory consultation by the land owner to interpret its intentions but should be clear and explicit on its face. It is clear from other chapters in the Local Plan that Westbridge Park is important Green Infrastructure and has an important recreational function as it accommodates leisure facilities, a girl guides centre, a childrens' playground and a canoe club house as well as being a vital green separation between Stone and Walton. The WYG retail capacity study identifies the part of Westbridge Park that accommodates the tennis courts and leisure centre as a potential development site but accepts that it is in the flood plain and is not well located to existing retail facilities. However, as the Local Plan expressly states that there is no provision being made for retail development then it would appear that the undefined mixed use allocation, for which no site specific provision is made, does not include retail. It is therefore difficult to understand what provision is being made and for what purpose.

**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 words "including the provision of mixed use development at Westbridge Park" should be deleted from Policy STONE 1. This change will make the Plan sound because it removes imprecision and ambiguity. The deletion of the allocation of undefined land within the designated green infrastructure for undefined development for which there is no stated justification will make the Plan compliant with national guidance.

*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

**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**

KWPG consider it important to be able to participate in the Examination in Public because the future of Westbridge Park is an emotive and controversial issue with 4771 people signing a petition in favour of saving the park as a leisure amenity. The Local Plan is ambiguous and imprecise and it is important for KWPG to be able to participate in any discussion of policies which will shape the future of Westbridge Park.

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	Keep Westbridge Park Green ( )
Comment ID	PS82
Response Date	18/02/13 11:30
Consultation Point	5.2 Paragraph ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

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

Paragraph 5.2, point 17 - Key Objectives - Stone The objective to deliver new mixed use town centre proposals to enhance Stone seems to be included to provide support for the Westbridge Park allocation. The comments made in respect of Policy Stone 1 apply in that there is no justification in the Local Plan for further mixed use development. KWPG support appropriate town centre development but object to any "allocation" of land for development at Westbridge Park. The key objective is unjustified. In addition, KWPG believe that the objective should also acknowledge the importance of the river as well as the canal in this designated area of Green Infrastructure.

**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.**

Key objective 17 should be reworded to: "Deliver appropriate development in the town centre to enhance Stone as a centre for retail, leisure, canal **and river** based and community facilities.

*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

**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**

KWPG consider it important to be able to participate in the Examination in Public because the future of Westbridge Park is an emotive and controversial issue with 4771 people signing a petition in their favour of saving the park as a leisure amenity. The Local Plan is ambiguous and imprecise and it is important for KWPG to be able to participate in any discussion of policies which will shape the future of Westbridge Park.

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	Keep Westbridge Park Green ( )
Comment ID	PS83
Response Date	18/02/13 11:30
Consultation Point	21 Policy E8 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

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

Policy E8 is inconsistent with national planning guidance set out in the National Planning Policy Framework relating to town centres which requires a "town centres first" approach. Whilst the supporting text states that a sequential test will be applied to planning applications to ensure that main town centre uses are located in town centres, this is not articulated in Policy E8 which refers to planning permissions being granted in edge of centre or out of centre locations. KWPG contend that the policy should be amended so that it is in line with national policy.

**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 second paragraph on page 9 of the Plan in Policy E8 should be amended to read: "Town centre uses shall be required to locate in town centres and permission for edge of centre and out of centre retail development will only be granted on the basis of a sequential approach to site selection that demonstrates that there are no sequentially preferable sites that are suitable, available and deliverable".

*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

**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**

KWPG consider it important to be able to participate in the Examination in Public because the future of Westbridge Park is an emotive and controversial issue with 4771 people signing a petition in favour of saving the park as a leisure amenity. The Local Plan is ambiguous and imprecise and it is important for KWPG to be able to participate in any discussion of policies which will shape the future of Westbridge Park.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Trustees of Stone Common Plot (Mr Peter G Hamilton)
Comment ID	PS84
Response Date	14/02/13 14:01
Consultation Point	12 POLICY STONE 1 ? STONE TOWN ( <a href="#">View</a> )
Status	Processed
Submission Type	Letter
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

I have been asked by my Trustees to write regarding the plans which are currently undergoing a consultation process. We wondered if any consideration was being given in the planning to possible knock-on effects to the North end of town. There are two specific areas of interest to us. The first is the land off Old Road which the Borough lease from the Trustees. This is probably under-utilised at present. The second is possible increase in footfall on the Common Plot itself if Westbridge Park is closed or reduced in size. We have already noticed a considerable increase in foot traffic since the recent opening of a path from the Navigation Loop estate onto Meaford Road. This does put additional strain on our infrastructure.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mrs Jane Glover
Comment ID	PS85
Response Date	18/02/13 16:27
Consultation Point	33 Policy N3 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Justified

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

We wish to comment to the DPD on the policy for renewable energy. We accept that climate change has to be addressed and targets are in place by the Government. The Government has committed to 13GW onshore by 2020 meaning the amount of onshore wind farms constructed or in planning, is nearing the target. So the proposal of thirteen sites with three or more turbines. Seems excessive and not justified Onshore wind turbines have been proved extremely inefficient and national statistics show then to be 12% - 23% efficient. They are expensive compared with other forms of green energy such as Solar or Biomass, which are less obtrusive. The Government has announced that the public are to get new rights in the appeals against wind turbines. Planning works best when communities have the opportunity to be involved with planning decisions that may affect their lives. This is only fair when our Taxes are use to subsidy green targets.



## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr Nicholas Bostock
Comment ID	PS86
Response Date	19/02/13 11:12
Consultation Point	11 POLICY STAFFORD 4 ? EAST OF STAFFORD ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.5

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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Positively prepared

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

Comments relate to paragraph 7.3 New Strategic Housing Sites, 7.34 Proposed Development East of Stafford, 7.35 Phase 1 of Eastern Distributor Road.

I note that the Plan identifies two new Strategic Development Sites on the east side of Stafford, both north and south of Tixall Road. The promoters, CEG and First City, intend to build 800 family homes here. They are also proposing to deliver the first phase of the Easter Access Improvement Scheme (also known as the Eastern Distributor Road) from Weston Road to St Thomas Lane. This lane leads into Baswich Lane at St Thomas Priory.

Baswich Lane crosses the Sow Valley by three narrow bridges, suitable for one-way traffic only. The first at St Thomas Mill has a hairpin bend and cannot be negotiated by anything larger than a car or light goods vehicle. The second is a fine Grade 1 listed bridge over the River Sow. The third is a

hump-back bridge with a 7.5 tonne weight limit over the Staffordshire & Worcestershire Canal. This lane already carries very heavy traffic; week-day flows average about 10,000 vehicles, according to data supplied to me by Staffordshire County Council.

I am very concerned that the additional traffic generated by a further 800 homes in the immediate vicinity, and by the abrupt ending of the Eastern Distributor Road on St Thomas Lane, will result in traffic grid-lock and an increased risk of accidents.

In my view, it is essential that the proper road infrastructure is in place before any further development is permitted in this area. This can only be achieved by constructing a new road across the Sow Valley. This will be very expensive, and no doubt beyond the means of any developer, meaning that Government and Local Authority funding will be required. This is unlikely, pending an economic recovery. Meanwhile, alternative Strategic Housing Sites should be identified where adequate road infrastructure is either already in place or can be provided as part of the development.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	The National Grid ( )
Comment ID	PS87
Response Date	19/02/13 10:35
Consultation Point	The Plan for Stafford Borough - Publication ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.2
Files	<a href="#">AMEC response on behalf of National Grid.pdf</a>

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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

Forward Planning  
Stafford Borough Council  
Civic Centre  
Riverside  
Stafford  
ST16 3AQ

Julian Austin  
Consultant Town Planner

Tel: 01926 439091  
[n.grid@amec.com](mailto:n.grid@amec.com)

19<sup>th</sup> February 2013

Dear Sir / Madam

**Stafford Borough Council: Local Plan Publication version consultation  
SUBMISSION ON BEHALF OF NATIONAL GRID**

National Grid has appointed AMEC to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the current consultation on the above document.

**Overview – National Grid**

National Grid is a leading international energy infrastructure business. In the UK National Grid's business includes electricity and gas transmission networks and gas distribution networks as described below.

Electricity Transmission

National Grid, as the holder of a licence to transmit electricity under the Electricity Act 1989, has a statutory duty to develop and maintain an efficient, co-ordinated and economical transmission system of electricity and to facilitate competition in the supply and generation of electricity.

National Grid operates the national electricity transmission network across Great Britain and owns and maintains the network in England and Wales, providing electricity supplies from generating stations to local distribution companies. We do not distribute electricity to individual premises ourselves, but our role in the wholesale market is key to ensuring a reliable and quality supply to all. National Grid's high voltage electricity system, which operates at 400,000 and 275,000 volts, is made up of approximately 22,000 pylons with an overhead line route length of 4,500 miles, 420 miles of underground cable and 337 substations. Separate regional companies own and operate the electricity distribution networks that comprise overhead lines and cables at 132,000 volts and below. It is the role of these local distribution companies to distribute electricity to homes and businesses.

To facilitate competition in the supply and generation of electricity, National Grid must offer a connection to any proposed generator, major industry or distribution network operator who wishes to generate electricity or requires a high voltage electricity supply. Often proposals for new electricity projects involve transmission reinforcements remote from the generating site, such as new overhead lines or new development at substations. If there are significant demand increases across a local distribution electricity network area then the local network distribution operator may seek reinforcements at an existing substation or a new grid supply point. In addition National Grid may undertake development works at its existing substations to meet changing patterns of generation and supply.

## Gas Transmission

National Grid owns and operates the high pressure gas transmission system in England, Scotland and Wales that consists of approximately 4,300 miles of pipelines and 26 compressor stations connecting to 8 distribution networks. National Grid has a duty to develop and maintain an efficient co-ordinated and economical transmission system for the conveyance of gas and respond to requests for new gas supplies in certain circumstances.

New gas transmission infrastructure developments (pipelines and associated installations) are periodically required to meet increases in demand and changes in patterns of supply. Developments to our network are as a result of specific connection requests e.g. power stations, and requests for additional capacity on our network from gas shippers. Generally network developments to provide supplies to the local gas distribution network are as a result of overall demand growth in a region rather than site specific developments.

## Gas Distribution

National Grid also owns and operates approximately 82,000 miles of lower-pressure distribution gas mains in the north west of England, the west Midlands, east of England and north London - almost half of Britain's gas distribution network, delivering gas to around 11 million homes, offices and factories. National Grid does not supply gas, but provides the networks through which it flows. Reinforcements and developments of our local distribution network generally are as a result of overall demand growth in a region rather than site specific developments. A competitive market operates for the connection of new developments.

## **National Grid and Local Development Plan Documents**

The Energy White Paper makes clear that UK energy systems will undergo a significant change over the next 20 years. To meet the goals of the white paper it will be necessary to revise and update much of the UK's energy infrastructure during this period. There will be a requirement for:

- an expansion of national infrastructure (e.g. overhead power lines, underground cables, extending substations, new gas pipelines and associated installations); and
- new forms of infrastructure (e.g. smaller scale distributed generation, gas storage sites).

Our gas and electricity infrastructure is sited across the country and many stakeholders and communities have an interest in our activities. We believe our long-term success is based on having a constructive and sustainable relationship with our stakeholders. Our transmission pipelines and overhead lines were originally routed in consultation with local planning authorities and designed to avoid major development areas but since installation much development may have taken place near our routes.

We therefore wish to be involved in the preparation, alteration and review of Development Plan Documents (DPDs) which may affect our assets including policies and plans relating to the following issues:

- any policies relating to overhead transmission lines, underground cables or gas pipeline installations;
- site specific allocations/land use policies affecting sites crossed by overhead lines, underground cables or gas transmission pipelines;
- land use policies/development proposed adjacent to existing high voltage electricity substation sites and gas above ground installations;
- any policies relating to the diverting or undergrounding of overhead transmission lines;
- other policies relating to infrastructure or utility provision;
- policies relating to development in the countryside;
- landscape policies; and
- waste and mineral plans.

In addition, we also want to be consulted by developers and local authorities on planning applications, which may affect our assets and are happy to provide pre-application advice. Our aim in this is to ensure that the safe and secure transportation of electricity and gas is not compromised.

## National Grid infrastructure within Stafford Borough Council's administrative area

### Electricity Transmission

National Grid has no high voltage electricity overhead transmission lines / underground cables within Stafford Borough Council's administrative area.

National Grid has provided information in relation to electricity transmission assets, including maps and GIS shape files showing their broad locations, via the following internet link:

<http://www.nationalgrid.com/uk/LandandDevelopment/DDC/GasElectricNW>

### Gas Transmission

National Grid has the following gas transmission assets located within the administrative area of Stafford Borough Council:

Pipeline	Feeder Detail
5359	21 Feeder Audley/Alrewas
6689	4 Feeder Audley/Alrewas

National Grid has provided information in relation to gas transmission assets, including maps and GIS shape files showing their broad locations, via the following internet link:

<http://www.nationalgrid.com/uk/LandandDevelopment/DDC/GasElectricNW>

### Gas Distribution

National Grid Gas Distribution owns and operates the local gas distribution network in the Stafford Borough Council area. If you require site specific advice relating to our local gas distribution network then information should be sought from:

Plant Protection Team  
National Grid Gas  
Lakeside House  
The Lakes  
Bedford Road  
Northampton  
NN4 7SN

### **Specific Comments**

The proposed strategic development location (housing) – Policy Stafford 2 (North of Stafford) lies in close proximity to the following high pressure gas pipeline.

- 5359      21 Feeder Audley/Alrewas

Our underground pipelines are protected by permanent agreements with landowners or have been laid in the public highway under our licence. These grant us legal rights that enable us to achieve efficient and reliable operation, maintenance, repair and refurbishment of our gas transmission network. Hence we require that no permanent structures are built over or under pipelines or within the zone specified in the agreements, materials or soil are not stacked or stored on top of the pipeline route and that unrestricted and safe access to any of our pipeline(s) must be maintained at all times.

Local authorities have a statutory duty to consider applications for development in the vicinity of high pressure (above 7 bar) pipelines and to advise the developer on whether the development should be allowed on safety grounds on rules provided by HSE. This advice is provided by the HSE Planning Advice

for Development near to Hazardous Installations (PADHI) process. The relevant HSE guidance can be accessed via the following link: <http://www.hse.gov.uk/landuseplanning/padhi.pdf>

In order to ensure that National Grid's pipelines are protected from uncontrolled development in the vicinity of the pipeline please also read the following guidance prepared by National Grid:

- Specification for Safe Working in the Vicinity of National Grid High Pressure Gas Pipelines and Associated Installations - Requirements for Third Parties  
[http://www.nationalgrid.com/NR/rdonlyres/50ACAC0A-ED26-41A7-91FA-83163A98270F/23790/TSPSSW22\\_J537\\_Rev0807.pdf](http://www.nationalgrid.com/NR/rdonlyres/50ACAC0A-ED26-41A7-91FA-83163A98270F/23790/TSPSSW22_J537_Rev0807.pdf)
- Gas Transmission Underground Pipelines – Guidance  
[http://www.nationalgrid.com/NR/rdonlyres/446009BF-ABB5-42E1-B9FE-44E90D577DD5/18653/APTGasGuidance\\_2\\_.pdf](http://www.nationalgrid.com/NR/rdonlyres/446009BF-ABB5-42E1-B9FE-44E90D577DD5/18653/APTGasGuidance_2_.pdf)

Should these sites be taken forward as development sites in the future, the developers should be made aware of the above issues.

#### **Further Advice**

National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. In addition the following publications are available from the National Grid website or by contacting us at the address overleaf:

- National Grid's commitments when undertaking works in the UK - our stakeholder, community and amenity policy;
- specification for Safe Working in the Vicinity of National Grid High Pressure Gas Pipelines and Associated Installations - Requirements for Third Parties; and
- A sense of place - design guidelines for development near high voltage overhead lines.

Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:

Julian Austin  
Consultant Town Planner

[n.grid@amec.com](mailto:n.grid@amec.com)

AMEC E&I UK  
Gables House  
Kenilworth Road  
Leamington Spa  
Warwickshire  
CV32 6JX

I hope the above information is useful. If you require any further information please do not hesitate to contact me.

Yours sincerely,

[via email]

**Julian Austin**  
**Consultant Town Planner**

cc. Vicky Stirling, National Grid

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr Steve Machin
Comment ID	PS88
Response Date	19/02/13 14:37
Consultation Point	11 POLICY STAFFORD 4 ? EAST OF STAFFORD ( <a href="#">View</a> )
Status	Processed
Submission Type	Letter
Version	0.4
Files	<a href="#">S Machin map.pdf</a>

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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Justified

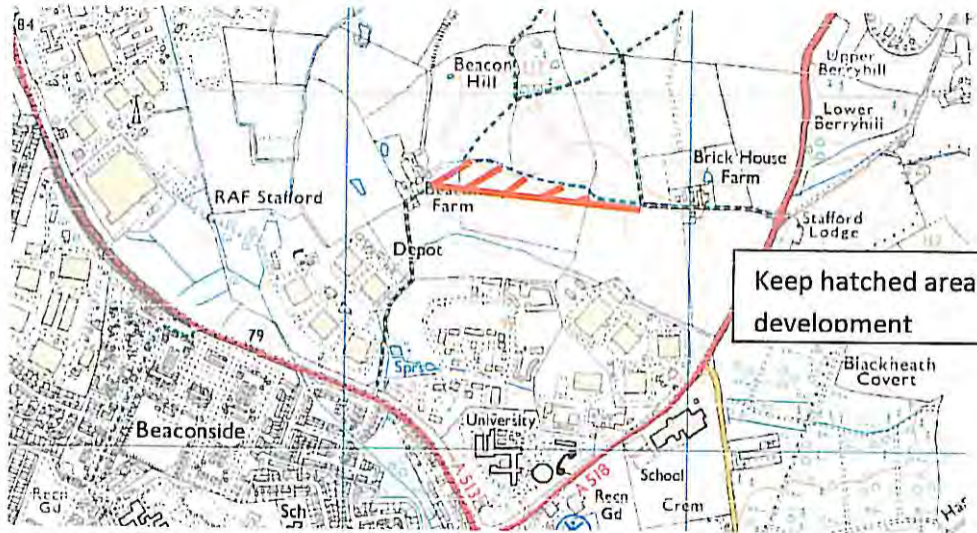
**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The plan creates Urban Sprawl by development of houses on farmfields at Marston and by extending the industrial site by police headquarters on Weston Road. I am against all sprawling development on greenfield sites. It loses natural habitat and valuable farmland. I asked in my letter of 18 October 2011 that the boundary of the industrial extension on Weston Road by the police headquarters was changed to protect the aesthetics of Beacon Hill. This could be achieved by preserving the hatched area on the plan below and keeping it free from development.

It seems this request and all my other comments went unheeded and that you obviously prefer to develop without reference to any conservation.



We would all do well to be aware of the reason why such development is proposed i.e an out of control population boom that saw 723,913 births in England and Wales in 2011 and net immigration of 250,000 - an addition of 974,000 in population in one year (Office of National Statistics and migrationwatchuk.org). By 2015 there is predicted to be another 7M people above the 2011 census figure. Under the running tap of population growth you put a development bucket that quickly flows over. Your answer is to place a bigger bucket under it thinking that is the answer. The correct solution is to turn off the tap. Until population is controlled your development bucket will get larger and larger, enveloping greenfields and whatever green and pleasant land we used to cherish. In conclusion perhaps you could tell me why you don't think Beacon Hill should be protected?



Keep hatched area free from development

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	South West HARP Planning Consortium ( )
Comment ID	PS89
Response Date	19/02/13 11:23
Consultation Point	2 SPATIAL PRINCIPLE 2 (SP2) ? STAFFORD BOROUGH HOUSING & EMPLOYMENT REQUIREMENTS ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Justified  
. Effective

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

Following on from our previous representations to the Strategic Policy Choices consultation, we welcome the Council's decision to exclude housing provision for military households and Gypsies and Travellers from the wider housing target. This will allow the Council to more effectively focus on the specific needs of each of these groups through separate targets. We consider this aspect of the Plan to be sound. We remain very concerned that the proposed housing target of 500 dwellings per annum across the Plan period will fail to meet local housing need, and demand, therefore failing the tests of soundness, being neither justified nor effective. The 2012 SHMA does not support the housing delivery target of 500 homes per annum. That document indicates a baseline need for 234 affordable dwellings per annum to meet the need arising from newly-forming households. The SHMA notes that "this modelling does not include future affordable development which would help to offset the scale of

affordable shortfall identified" (paragraph 4.84). The shortfall in affordable housing delivery is identified as 210 dwellings per annum, a figure that is then noted as likely to be an underestimate. The 500 dwellings per annum target currently set in the Plan would fall far short of meeting this affordable housing need, being unambitious and inconsistent with policy in the NPPF which requires local planning authorities to "ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area" (paragraph 47). This key strategic policy failure would further exacerbate the shortfall in affordable housing delivery over the long term and for these reasons we consider the Plan to be unsound, being ineffective, unjustified and inconsistent with the NPPF. We would urge the Inspector to ask the Council to reconsider its approach to the housing target, increasing this number to better reflect the scale of affordable housing 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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	South West HARP Planning Consortium ( )
Comment ID	PS90
Response Date	19/02/13 11:23
Consultation Point	24 Policy C1 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.5

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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

We support the Council's policy to encourage a variety of dwelling types and sizes. We consider that the policy would benefit from a minor text alteration, as shown below:

**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.**

*2. Housing developments will be required to provide a mix of dwelling types on site. However, the final mix will be determined in line with **local needs** , Government policy and linked to design issues. This change would improve the effectiveness of the policy, by enabling both developers and the Council*

*to respond more flexibly to local circumstances which may differ significantly between locations and over time, saving officer time and improving housing mix. By making this minor change we consider the policy to be sound.*

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	South West HARP Planning Consortium ( )
Comment ID	PS91
Response Date	19/02/13 11:23
Consultation Point	25 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.5

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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

Following our previous representations we welcome the Council's change in policy to adopt a higher affordable housing target in the most viable areas of Stafford. We consider that setting an ambitious target will aid the delivery of affordable housing in Stafford, as well as providing an effective, flexible policy justified by a robust evidence base. We support this policy as sound.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	South West HARP Planning Consortium ( )
Comment ID	PS92
Response Date	19/02/13 11:23
Consultation Point	26 Policy C3 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

We support the Council's policy to encourage the development of a range of specialist housing, including extra care accommodation, to meet the varied local needs across the borough. We are however concerned that point b) of this policy is too restrictive and will prevent extra facilities coming forward. Much specialist accommodation requires large plots of land to provide the necessary facilities and such plots are often on the edge of settlements. In addition, on a significant scheme many services, such as restaurants, shops and hairdressers are provided within the development. This means there is less requirement for schemes to be proximate to local services as residents have the opportunity to fulfil their needs within the development. We suggest a minor alteration, shown below:

**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.**

*"b. Ensuring any new developments are located in **or adjoining** a settlement within the settlement hierarchy..."*

We consider this minor alteration would improve the effectiveness of the policy, by enabling suitable developments to come forward in sustainable locations that respond flexibly to local circumstances. By making this minor change we consider the policy to be sound

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	South West HARP Planning Consortium ( )
Comment ID	PS93
Response Date	19/02/13 11:23
Consultation Point	28 Policy C5 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Consistent with national policy

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

We are concerned that this policy does not take into account the potential development of affordable housing via cross-subsidy on rural exception sites. With the level of central Government funding for affordable housing decreasing, RPs have developed alternative funding methods to continue to provide affordable housing. One method is developments whereby the affordable element is cross-subsidised by general market housing. This method of affordable housing delivery is explicitly supported by the NPPF which states: "*Small numbers of market homes may be allowed at the local authority's discretion, for example where essential to enable the delivery of affordable units without grant funding.*" (Appendix 2) Setting a maximum proportion of market housing at 50% would ensure that rural exception schemes deliver a significant level of affordable housing. We consider this alteration necessary to ensure policy C5 is consistent with the NPPF and suggest a minor alteration to part b) as well as an additional paragraph within the policy to achieve this. Our suggestions alterations and addition is below:

**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.**

*"b. The site delivers either 100% affordable housing (defined as social rented, affordable rented and intermediate housing) in perpetuity (there is no right to Buy or Right to Acquire on rented properties and that shared ownership sales and re-sales are capped at 80%) or over 50% affordable housing on a cross-subsidised scheme (see description below) Where no public grant for affordable housing is available, the Council will consider affordable housing schemes cross-subsidised by general market housing. The general market aspect of the scheme should not exceed 50% of the total dwellings proposed and the whole scheme will be subject to an open-book viability assessment.*

*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

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	The Theatres Trust ( Rose Freeman)
Comment ID	PS94
Response Date	21/02/13 12:02
Consultation Point	30 Policy C7 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.6

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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

- . Effective
- . Consistent with national policy

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

We do not support the document as there are some inconsistencies regarding the protection of the Borough's community facilities. There is no policy for all community facilities. Of the two policies that provide guidance for the loss of an existing facility - one only deals with centres (E8) and the other only deals with open space, sport and recreation (C7). Appendix E on page 168 states that **Policy C7** will provide guidance "where a loss of sole community facilities is proposed". This is not correct - Policy C7 only deals with open space, sport and recreation (a "hangover" from PPG17). Policy C7 does not deal with all community facilities and there is no policy that does, which does not reflect item 70 in the National Planning Policy Framework (NPPF) on page 17 which states that to deliver the social, recreational and cultural facilities and services that the community needs, planning policies and decisions should plan for the use of shared space and guard against unnecessary loss of valued facilities. Also to ensure that established facilities and services are retained and able to develop for the benefit of the community.

**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.**

We suggest that Policy C7 is amended to include all the Borough's community facilities and that the description of community facilities be transferred from para.9.32 to para.11.22. The title should change to Social, Recreational, Cultural and Community Facilities (or similar) to reflect para.11.22. The wording of the policy would only require minor tweaking to ensure all community facilities were included throughout the Borough to harmonize with the NPPF.

*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

of the policy would only require minor tweaking to ensure all community facilities were included throughout the Borough to harmonize with the NPPF.

We suggest that the description for community facilities at para.9.32 is updated to "health and wellbeing" to reflect item 17 of the NPPF.

*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

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	The Theatres Trust ( Rose Freeman)
Comment ID	PS95
Response Date	20/02/13 12:02
Consultation Point	11.22 Paragraph ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.7

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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

- . Effective
- . Consistent with national policy

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

Paragraph 11.22 refers to social and cultural facilities which comprise more than just sport and recreation - cultural facilities also include libraries, museums, cinema and theatre which are not dealt with in this policy.

**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.**

We suggest that Policy C7 is amended to include all the Borough's community facilities and that the description of community facilities be transferred from para.9.32 to para.11.22. The title should change to Social, Recreational, Cultural and Community Facilities (or similar) to reflect para.11.22. The wording



## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	The Theatres Trust ( Rose Freeman)
Comment ID	PS96
Response Date	20/02/13 12:02
Consultation Point	21 Policy E8 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.7

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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

- . Effective
- . Consistent with national policy

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

**Policy E8** concerns Centres and the accompanying text includes an excellent description (which could be updated) for the term "community facilities" at para.9.32, but this term is not used in the actual policy. For clarity, we suggest the items in the policy are numbered for ease of reference, and that the paragraph "Support will be given to proposals ....." on page 83 includes the term "community facilities". This policy only covers facilities in centres, not elsewhere, therefore is not consistent with NPPF items 70 and 156.

**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 clarity, in Policy E8, we suggest the items in the policy are numbered for ease of reference, and that the paragraph "Support will be given to proposals ....." on page 83 includes the term "community facilities" for clarity.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mrs Margaret Minshull
Comment ID	PS97
Response Date	20/02/13 14:24
Consultation Point	The Plan for Stafford Borough - Publication ( <a href="#">View</a> )
Status	Processed
Submission Type	Letter
Version	0.4
Files	<a href="#">M Minshull map</a>

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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

I am writing to reply to a letter my family received dated 11th January 2013, regarding the Plan for Stafford Borough Publication and the Associated Revised Sustainability Appraisal Report.

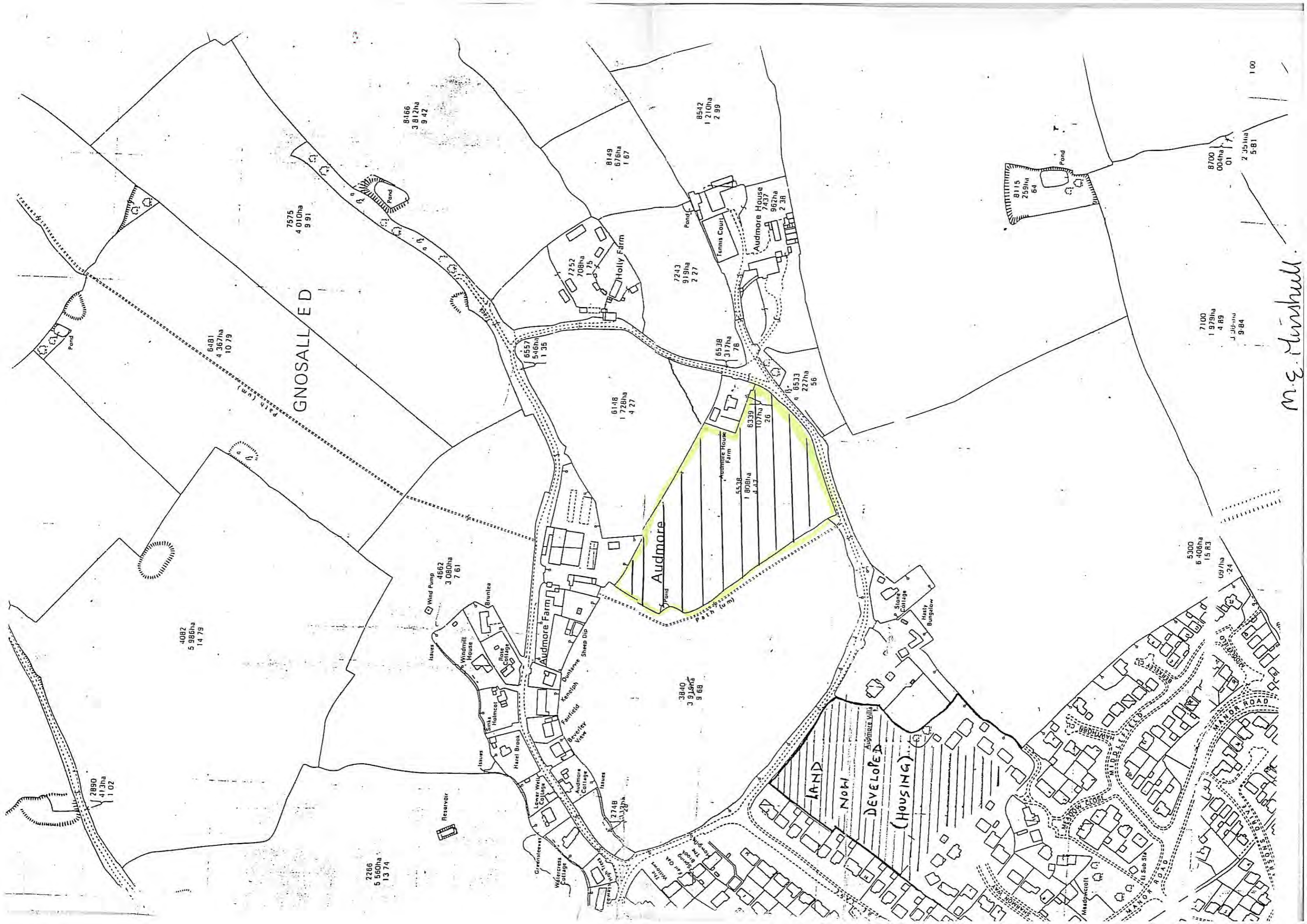
My family and I own 1.808 hectares of land in Gnosall, field no 5538 (please refer to map enclosed coloured in) which I believe is located in the GN2 area referred to in the revised Sustainability Appraisal Report of January 2013.

I note that the plan for Stafford Borough proposes that there will be a requirement of 1,200 homes in the key service villages, one being Gnosall. Having spoken to your office it was suggested that with Ms S R Moulton (whose land adjoins my family's) we attend a meeting with Mrs J Cooper, Clerk of

Gnosall Parish Council in order to discuss this matter in more detail and possible inclusion of my land in their proposed Neighbourhood Plan. We have now met up with Gnosall Parish Council who are looking further into the matter.

I have decided not to complete all of the form as due to my advanced years (in my 80's) I am finding this process difficult to understand and therefore do not feel it would be honest of me to complete the form as requested in terms of whether the Plan for Stafford Borough is legally compliant and sound, when I don't fully understand all the information presented to me. I do hope you will understand this.

I do know however, that my piece of land may be suitable for small scale housing development. I trust that you will find this information useful I and my family are prepared to discuss the sale of this field at any time.



GNOSALLED

Audmore

LAND NOT DEVELOPED (HOUSING)

7575  
4 010ha  
9 91

6481  
4 367ha  
10 79

4082  
5 986ha  
14 79

2890  
413ha  
1 02

2266  
5 560ha  
13 74

4862  
3 080ha  
7 61

8166  
3 812ha  
9 42

6148  
1 728ha  
4 27

3840  
3 918ha  
9 68

7243  
919ha  
2 27

6339  
1 808ha  
4 17

6557  
546ha  
1 35

8542  
1 210ha  
2 99

8149  
676ha  
1 67

6533  
227ha  
56

6538  
317ha  
78

7100  
1 978ha  
4 89

8115  
259ha  
64

8700  
004ha  
01

2 35ha  
5 81

5300  
6 406ha  
15 83

09/ha  
24

M.S. Hinchell

100

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Lingreen Properties Limited (Mr Anton Hyland)
Comment ID	PS98
Response Date	21/02/13 14:45
Consultation Point	The Plan for Stafford Borough - Publication ( <a href="#">View</a> )
Status	Processed
Submission Type	Letter
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

I write in connection to the above publication and commend the council's officers for the preparation of a very intelligent and intelligible document that identifies the needs of the borough.

In particular it appears to protect the integrity of the planning process by retaining the weight previously afforded to conserving the green belt areas within its boundary and by continuing to give due consideration to the specific needs of each area.

The recognition of the need to attract new business to the area to provide appropriate employment for the expanding population is a very necessary consideration. That, together with the implementation of the accompanying infrastructure, needs to be actively implemented once the plan has been approved.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr Ian Moss
Comment ID	PS99
Response Date	21/02/13 12:52
Consultation Point	10 POLICY STAFFORD 3 ? WEST OF STAFFORD ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

- . Positively prepared
- . Justified
- . Effective

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

**POLICY STAFFORD 3 - WEST OF STAFFORD** The existing Castlefields Estate already provides a strong visual impact from Stafford Castle. The West of Stafford housing proposals do not appear to adequately relate to the setting and the importance of this historic and cultural asset. Can the building line of the original estate be used as a guide to keeping the visible impact to a minimum? There is a bridalway which is acting as the building line at present. Can this not be followed right up to the M6 and be used as a definitive building line? When we had a land search on a property acquisition on Castlefields Estate four years ago there was no indication that a school and local centre were planned. It would seem more appropriate that new amenities and facilities were better integrated within the new development. I believe the scale of the West Stafford proposals warrant the provision of a full bypass scheme. This long held proposal now seems to be absent from this Submission Plan. It seems unlikely

that public funding for this scheme can be justified and that the developers contribution would be unlikely to provide the required scheme. Consideration should be given to aligning the Western bypass 200m or so further north to connect with the roundabout at the junction of the Eccleshall B5013 and Stone Rd A34. As the Bristol Street Body shop has recently closed this would seem an opportunity to provide a more appropriate exit point for the western bypass.



## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	Mr Paul Windmill
Comment ID	PS100
Response Date	21/02/13 16:15
Consultation Point	6.51 Paragraph ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.6

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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

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

Paragraphs 6.51, 6.53 and 6.54 **Summary** The methodology to calculate the requirement for new allocations of land for new housing is considered to be so fundamentally flawed as to make the plan unsound.

**Reason** The method of calculation used assumes that no planning permissions will be granted after the 31 st March 2012 other than on sites allocated for development in the plan. **Soundness issues**  
**Positively Prepared** The plan is prepared based on a strategy which will not be likely to meet objectively assessed development requirements (they are likely to be exceeded). It is questionable whether the scale of allocation proposed is justified and also whether the strategy is consistent with achieving sustainable development in its dominance by Greenfield development. *Note The majority of new development (70%) proposed is to meet requirements from neighbouring authorities. It is assumed*

*that the plan is based on effective joint working on cross-boundary strategic priorities. Perhaps this needs to be emphasised with evidence* **Justified** The plan is not the most appropriate strategy based on a robust and credible evidence base as the evidence base suggests that a major source of delivery has not been taken into account (new homes on 'windfall' sites.) The plan is not considered to be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. **Effective** - the plan should be deliverable over its period - the reliance on large scale Greenfield sites combined with the lack of evidence of landowner/promoter commitment and agreement on viability of the plan proposals as currently put forward bring deliverability into question (see separate, more detailed, representation). **Consistent with national policy** - the plan may not enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework due to the over-emphasis on major Greenfield sites and the exclusion of previously developed 'windfall' sites. The evidence base strongly suggests that the Local Plan will significantly exceed the full, objectively assessed needs for market and affordable housing **Note** It is accepted that the method referred to in the Plan's paragraph 6.51 is reasonable for the purposes of demonstrating that there is currently more than a 5 year supply of land referred to in the National Planning Policy Framework (See particularly NPPF Section 6 Paragraph 47 Bullet Point 2 and related footnote.)

**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.**

**Why changes would make the document sound** The Plan would be considered to be made sound if allowance was made for the continued grant of planning permissions on sites not allocated for development in the plan, sometimes called "windfall" sites. **Reason** The Borough Council has a long history of granting permissions for housing development on unallocated sites where such development has been seen to be appropriate as shown in the Council's publication "Land for New Homes 2012" <http://www.staffordbc.gov.uk/live/Documents/Forward%20Planning/LDF/Land-for-New-Homes-2012.pdf> Table 11 of Land for New Homes 2012 shows an annual average of 406 new homes receiving consent on 'windfall' sites in the period 1997 - 2012. In Table 2 shows an average completion rate of 461 new homes per year over the 16 year period 1997 to 2012. (Both "Allocated" and "Windfall" sites.) Table 8 shows that the average completion rate on "Windfall" sites as 343 over the 15 year period 1998 -2102. Comparison of Tables 7 and 8 shows that, over the prolonged period used, an average of over 70% of new homes have been built on "windfall" sites. Table 8 shows that the majority (69%) of new homes on "windfall" sites have been on "brownfield" (previously developed) land. I would suggest that the evidence provided by the Council (e.g. in Land for New Homes) shows no trend to a reduction either in the number of new homes granted consent or in the number of new homes completed on "Windfall" sites. It appears to me that the Council has always been realistic and prudent in its approach to housing on 'Windfall' sites. So far as I am aware Stafford Borough Council (unlike many other Councils) has not previously used 'moratoriums' when considering planning applications for acceptable new "Windfall" sites for homes. Other than in Paragraph 6.49 of the Plan I have found no evidence in the Plan's policies or elsewhere to suggest a proposed change of policy or approach involving the refusal of consent for acceptable "windfall" development On this basis I would submit that:-

- . The completion of a significant number of new homes on "Windfall" sites is likely through the plan period
- . Allowance should be made in the plan for the continuation of the completion of homes on "Windfall" sites.
- . That, as a starting point, the allowance for "Windfall" sites should be related to rates previously experienced.
- . Paragraph 6.51 of the Plan for Stafford Borough should be deleted as this only makes allowance for committed sites (principally those with planning permission) as at the end of March 2012 and assumes that no further consents will be granted for any new homes on "Windfall" sites. Paragraphs 6.53 and 6.54 should also be deleted as these are consequential to Paragraph 6.51. I would suggest that:-

- . An allowance for the continuation of the granting of planning permission for acceptable "Windfall" sites should be made.
- . This assumption should be inserted into the Plan (instead of the existing Paragraph 6.51)

The "residual requirement" for new allocations to replace the table in Paragraph 6.54 could be along the following lines:- **Requirements For new housing in the whole of Stafford Borough = 10000** (30% for locally generated demand and 70% for in-migration - see the Development Strategy section of the Plan) **Completions 2011 - 2012 = 425** (See Land for New Homes 2012) **Potential "Windfall" completions expressed as a range from A) 6517 to B) 5130** A) a continuation of the average for the last 15 years\* (19 years x 343\*\*) B) a reducing the annual average completion rate over the plan period from 340 to 200\* (19 years x 270) **Residual requirement to be met by site specific housing allocations A) 3058 to B) 4445 Potential new housing for military personnel 400** (Separate additional provision, if required, for Service Family Accommodation) \* *Or an alternative considered more appropriate by the Borough Council and/or the Inspector.* \*\* *Land for New Homes 2012* That there should also be a policy on the phasing of allocations (currently apparently omitted) with the objective of meeting a housing trajectory, such as are included in Appendix G to the plan but which takes into account the rate of development of "windfall" housing sites. *Note* I appreciate that trajectories have inherent problems but the assumption of the numbers of houses completed becoming negative at the end of the plan period seems bizarre.

*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

**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**

To be part of any discussion of future housing requirements. To be part of any discussion of the balance of 'Windfall' and 'Allocated' sites/locations.

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	Mr Paul Windmill
Comment ID	PS101
Response Date	21/02/13 16:15
Consultation Point	9 POLICY STAFFORD 2 ? NORTH OF STAFFORD ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.5

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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

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

Stafford Policy 2 - North of Stafford, Stafford Policy 3 - West of Stafford, Stafford Policy 4 - East of Stafford, Policy Stone 2 - West and South of Stone, Policy Stone 1, Policy C7 (These have been combined onto a single form due to their linked or common themes and to avoid repetition) **Justified** For the reasons given in a separate objection it is considered that the total number of new homes proposed on the Strategic Development Locations identified in the policies referred to in Question 3 are so excessive as to bring into question the soundness of the Plan. **Effective** In the currently apparent absence of evidence of appropriate agreements between Stafford Borough Council and the promoters/owners of the areas of land allocated for housing use it is considered that it has not been clearly demonstrated that the key sites/locations identified are viable and will be brought forward as anticipated. **Consistent with National Policy** Whilst the Policies may be seen as compliant with consistent with much of the National Planning Policy Framework it is questioned whether the key sites/locations identified in respect of the third bullet point (and the related footnote) and the fourth bullet point of Paragraph 47 in respect

of the supply of housing. Paragraph 111 of the National Planning Policy Framework reads:- "Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value. Local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land..." In respect of Stafford, the plan does not seem to meet the first parameter nor does it appear to indicate the authority's approach on the second element of the paragraph. It is not clear how Paragraph 112 of the National Planning Policy Framework is being met:- "...Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality".... Parts of the document detailed below do not appear to conform to Paragraph 74 of the National Planning Policy Framework re existing open space, sports and recreational buildings and land, including playing fields.

**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.**

**NPPF** It is accepted that there is a potential benefit from extensions to towns that follow the principles of Garden Cities. (NPPF Paragraph 52) and that most of the new homes proposed are in large scale extensions to Stafford but a key question is whether or not these large-scale schemes can deliver the requirements of the Local Plan.

**Delivery** Whilst the Local Plan is detailed in the requirements for each of the locations there has been little information about how these developments are to be delivered e.g. on the anticipated rate of development, any analysis of relevant costs, thresholds, anticipated cash flow or any apparent confirmation from owners and promoters that they are prepared to deliver the Local Plan requirements for the locations. It is not considered to be acceptable to set such a significant and ambitious policy without clearly and openly addressing its delivery, preferably as a clear and public joint commitment with the promoters/owners. So far as I can see this is not what the plan does at present. **Masterplans** I support the principle of requiring agreed Masterplans in advance of applications and would suggest that these should be prepared to a specific standard such as CABE's "Preparing Successful Masterplans"

<http://webarchive.nationalarchives.gov.uk/20110118095356/http://www.cabe.org.uk/masterplans/implemented> and that this should be made clear in the Plan. Unfortunately I have not seen an agreed description of what is to be included in the four Master Plans - which are apparently not to be prepared by the Council jointly with the site promoters. **Infrastructure** One of the most significant issues in delivering large scale housing development, particularly given the current market is the funding and delivery of affordable housing and large-scale infrastructure. Each scheme has distinct infrastructure requirements in order to create a sustainable development. The scale of enabling infrastructure will often be extensive, both on and off site - roads, utilities, drainage, schools other community facilities. This is a particular issue in Stafford Borough because the sites are almost entirely "Greenfield", there is relatively limited infrastructure in place and significant investment may be required at the outset of a development. This is, however, balanced by the relatively low existing use value of the land areas and the lack of need for costly reclamation or remediation measures. This infrastructure requirement, together with an unspecified additional amount of Community Infrastructure Levy (CIL) creates a burden which in several locations could potentially reduce scheme residual values for landowners and which appears likely to present cash flow problems. **Infrastructure was seen as the major cause of delay in "Unlocking Garden Cities" Issue Date: Feb 2013 <http://www.gva.co.uk/research/> -see extracts below** "While a supportive national policy is a fundamental requirement, rhetoric alone will not help these new schemes to be realised. Bringing forward large scale residential development in the form of either urban extensions or new towns is a complex process and takes a considerable time." "...The most common cause for delay is the cost of funding infrastructure which is halting the delivery of around 80,000 new homes. Local demand or market is also another major consideration."... "A number of the schemes covered by our research are in the ownership of several organisations - either land owners or developers. This multiple-ownership is also hampering delivery as the parties involved are unable to agree or co-operate on a way forward. This is a particular issue around sharing in the cost of infrastructure, the timing/cash-flow implications, and the subsequent value creation."

**Uncertainty** The scale of development in two of the locations proposed in the local plan is significantly larger than any previous allocations in the Borough, the infrastructure and other costs are likely to be high and the uncertainties great. **Viability** Unless the promoters/landowners agree that the sites are viable in the current market and can deliver the totality of the proposals there are likely to be two effects:-

. The sites will not come forward  
or

Promoters will wish to defer and/or avoid - commitments to implement key aspects of the Plan such as the provision of affordable housing arguing that it does not give an acceptable residual development value and is unviable unless requirements are reduced or market housing numbers on the site are increased. In the absence of clear evidence of viability being provided in advance of the Examination from the Stafford Borough Council and/or the promoters/owners of the SDLs proposed I consider that the plan is potentially fundamentally unsound in respect of its SDLs. The inclusion by Stafford Borough Council of Appendix D is helpful in identifying some of the infrastructure costs of the Strategic Development Locations but these do not include all costs and only go part-way to providing the necessary information to establish viability. **Community Infrastructure Levy** The lack of information on potential CIL is regrettable and it is suggested that an informed estimate, based on requirements of similar Councils, would help in assessing viability. **Soundness issue** It is considered essential to demonstrating the soundness of the plan that the landowners and promoters in the Strategic Development Locations should indicate unambiguously that they consider that the Location can fully meet the requirements set out in the plan, that the Location is viable and it will provide sufficient economic return for them to bring the Location forward. If this cannot be agreed it brings into question whether the proposal is sound enough to be included in the Plan. **Relevant Related Note** In some cases, after gaining planning permission - including affordable housing, developers have argued that because of the amount which they paid for the land it was not viable to provide affordable housing and that a market only scheme should be allowed.

This risk could be avoided if

a) an agreed acceptable base value were set - such as 150,000 per hectare, still several times higher than agricultural use value but not so high as to preclude affordable housing and b) the landowner/promoter/developer argues that it is not viable to provide affordable housing they should be required to set aside a total of 30% of the residentially developable area of the specific phase of the site to be gifted to a Community Housing Trust - tasked with disposal to an affordable housing provider - with the net proceeds from disposal being paid to the relevant landowner/promoter/developer when the land is sold - or the land returned to the landowner/promoter/developer after a fixed period (of say 5 years) if an affordable housing provider does not buy and develop the land. The above principles could apply to other "potentially non-viable" uses such extra care and specialist housing - estimated in the plan as 1000 new homes (10% of the total housing provision) - schools or community facilities including open space. **Specific Locations Stafford Policy 2** - North of Stafford, the largest of the locations, by a substantial margin, at approximately 3,100 new homes the location is more than eight times larger than any single allocation in the previous local plan. This location alone is larger than all the allocations of the last Local Plan put together (a total of 2382 new homes -see Paragraph 3.11.12 of [http://www.staffordbc.gov.uk/live/images/cme\\_resources/Profiles/Forward%20Planning/Chapter%203%20\(PDF\).pdf](http://www.staffordbc.gov.uk/live/images/cme_resources/Profiles/Forward%20Planning/Chapter%203%20(PDF).pdf)) The demonstration of viability seems really crucial in this case as the total costs including 30% affordable housing, " **provision to meet the needs of an ageing population through new extra care and specialist Housing**", major infrastructure including a " **flood management scheme will be delivered to enable development of the Strategic Development Location including measures to alleviate flooding and improve surface water management on Marston Brook and Sandyford Brook**", the " **provision of a mix of uses including local retail facilities, social and physical infrastructure, a primary school, secondary education provision, a library service, health facilities and public open space**" provision costs are really substantial. Thresholds for investment, phasing and timing of development, the fair equalisation of costs between the various owners, unambitious residual development values, cash flow and potential net CIL liabilities are likely to be critical. **Stafford Policy 3** - West of Stafford would seem to require a residual development value significantly reduced to take account of the requirements such as to provide affordable housing, homesto meet the needs of an ageing population through specialist housing, community facilities and the identified on/off-site infrastructure. The proposals involve the loss of the Rugby Club stadium and significant loss of playing fields but I have not found any mention of this proposed loss, any justification for the loss or proposals for replacement. In these respects the proposal is contrary to NPPG Paragraph 74. Thresholds for investment, and timing of development, the fair equalisation of costs between the various owners, unambitious residual development values and cash flow are likely to be very relevant. As with Stafford Policy 4 the cost of an off-site road link could impact on viability. As with CIL and other contributions, the Western Access Improvements road funding would need to be secured by "real" money being put into road construction funds as each house is sold - but there should be no "double dipping" through CIL either for this or for the community uses to be provided in the SDL. **Stafford Policy 4** - East of Stafford The Plan lacks clarity on the status of the site for a cemetery extension and the basis on which this is required - is it a pre-requisite to the inclusion of the SDL - is it intended that the land should be gifted to the Council or purchased - and on what valuation basis, where it is proposed and when the land is to be provided? Similar questions arise in respect of the road required. **xv. Deliver phase 1 of the Eastern Distributor Road and associated transport improvements from Weston Road to Baswich Lane road bridge at St Thomas**"; Both the Plan and Appendix D are rather silent on the justification for the road,

on costs or apportionment. If the road is an essential part of the inclusion of the land in the SDL then it should be fully identified on the relevant map and the land should be required to be conveyed to the Highway Authority before development commences (or at an agreed point) - this should be a pre-requisite as it seems unlikely that the Highway Authority would succeed in land acquisition in other circumstances.

It is questioned, however, whether the road element of the proposals can be achieved unless all of the owners over whose land the route passes reach an agreement with the Councils, the loss of flood plain for the road can be mitigated and planning permission is sought and granted for the road.

As with CIL and other contributions, the Eastern Distributor Road funding would need to be secured by "real" money being put into road construction funds as each house is sold - but there should be no "double dipping" through CIL. Thresholds for investment, phasing and timing of development, the fair equalisation of costs between the various owners, unambitious residual development values and cash flow are likely to be important in this Location *Notes The proposals maps relating to the Strategic Development Location do not show the road as described in the text (the road ends at St Thomas Lane). The status, funding, full phasing and timing of the proposed Eastern Distributor Road (of which this proposal includes Phase 1) is very unclear.* **Policy Stone 2** - West and South of Stone - The provision of affordable housing, homes to meet the needs of an ageing population through new specialist housing, relatively limited infrastructure and other requirements - even including potential CIL seem to make this the most attractive of the identified locations in terms of residual development value per new home. It is questioned, however, whether there is justification for the site on other grounds.

The statement in the plan's paragraph 8.24 is welcomed and supported:- "The land west of Stone will comprise a greenfield housing site delivering a total of approximately 500 new homes and the employment area south of Stone will deliver a total of at least 18 hectares. The Strategic Development Location for housing has been included in the event that sufficient provision does not come forward through infill development. Furthermore due to the implications of new development at Stone on the North Staffordshire conurbation's urban regeneration initiatives, the housing and employment areas within the Strategic Development Location will not be delivered until after 2021, in order to provide an opportunity to deliver brownfield land development within the North Staffordshire area." I would suggest that the Paragraph is so important that it should form part of the Policy itself. Deletion from the plan would be inappropriate. Its release only if sufficient provision does not come forward through infill development could also be relevant for Stafford SDL's. **Numbers of new homes on SDLs** I have no found reference to housing density in the plan proposals and do not have the facility to calculate the areas of the housing proposals in the SDLs. However, given that the allocations in the current Local Plan having been consistently exceeded in terms of number of houses built when the sites are developed (see the 'Stafford Borough Local Plan 2001' for allocations and "Land for New Homes" for numbers of new homes built on the allocated sites), I would request that in the first paragraph of each of the policies included in this representation the word "approximately" should be deleted and the words "a maximum of" be substituted. **Site requirements** I would also suggest that it would be helpful to give an indication of the relevant site areas and the percentage of each site required for the uses identified in the policy - for example for Policy Stafford 2:- Homes

- . Market housing ...%
- . Affordable Housing ...%
- . Extra care housing ...%

#### Open Space

- . Open space for Cannock Chase Special Area of Conservation (SAC) mitigation/ Suitable Alternative Natural Greenspace (SANGS) ...%
- . A new Destination Park including children's play areas and multi-use games areas in addition to SANGS requirement if provided on-site /Green Infrastructure/Play spaces/Playing fields ...%

#### Community

- . Local Centre ...%
- . Primary schools ...%
- . Secondary School ...%

#### Abnormal Infrastructure

- . Drainage and flood management ...%

**Playing fields** It is recognised that the plan refers to additional facilities being provided in paragraph 11.22 with the intention to prepare a Supplementary Planning Document (SPD) on the subject and refers to enhancement in Policy C7 but does not convert these into proposals in the Plan. Paragraph 12.32 of the Plan refers to a previous plan but does not appear to have a policy to continue to provide protection for such areas.

In view of the lack of playing field provision on the allocations of the previous plan (despite the policy requiring such provision), the consistent loss of playing fields to other development in the last 15 years, and the lack of reference in the plan to new or replacement playing fields the Plan raises real concerns.

It is appreciated that Appendix G sets Local Space Standards and that part of Policy C7 reads:- ...Development that results in the loss of existing open space, sport and recreation facilities will be resisted unless better facilities in terms of quality, quantity and accessibility can be provided or that redevelopment would not result in a deficiency in the local area.... but I would suggest that, in the light of recent history, the Borough Council could reasonably be asked in the Examination to indicate, justify and quantify both its total playing field requirements and the requirements to be met by each of the identified locations in the Local Plan (see site requirements above) - including proposals for replacement of existing playing field facilities to be lost to other uses. In one SDL - Stafford Policy 3 - West of Stafford (referred to above) the proposals appear to involve the loss of existing playing fields at Doxey for proposed residential uses, the loss of part of the green network\*, the loss of the Rugby Club stadium at Castlefields, loss of playing fields adjacent to Kingsway and loss of protected open space\*all for proposed Mixed Use. \* *In the current Statutory Local Plan I have not found any mention of these proposed losses, their extent, any justification for the losses or any proposals for replacement in the Plan.* Although the Stafford Express and Star of 21 February 2113 reported that a deal had been struck by the landowner Lord Stafford and the Rugby Club for the club to re-locate and for the existing site to be redeveloped for housing and business. Policy Stone Town 1 indicates a proposed mixed use development as Westbridge Park, Stone " **a. Encouraging the development and expansion of the town centre to provide a vibrant place where people can meet, shop, eat and spend leisure time in a safe and pleasant environment including provision of mixed use development at Westbridge Park**" but the Plan does not seem to include any location on the diagrammatic plans or a location plan showing the area to be lost to the mixed uses described.

The term "Mixed Use" does not appear to be defined in the Plan. Lack of definition appears inappropriate, both in relation to specific sites and where used more generally. No reason is given for the lack of definition and uses such as market and affordable housing, caravan sites, hostels, hotels, restaurants and take-aways, pubs, clubs, food retail, comparison retail, car sales and repair, industrial units, warehousing, offices etc are not apparently excluded. In the cases referred to in Stafford Policy 3 and Stone Town 1 the proposals are considered to be potentially contrary to NPPG Paragraph 74 which reads:- 74. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- . an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; (*No evidence has been found for this in the Plan*) or
- . the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; (*No evidence has been found for this in the Plan itself*) or
- . the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss. (*No evidence has been found for this in the Plan in the Stafford case (but see note above re Press report), the evidence is ambiguous in the Stone case*)

*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

**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**

To contribute to the debate on the issues raised.



## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr Paul Windmill
Comment ID	PS102
Response Date	21/02/13 16:15
Consultation Point	29 Policy C6 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

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

a) Spatial Vision and b) Policy C6 The plan does not include site specific proposals for the provision of any sites for gypsies and travellers despite the evidence of need and explicit Government Policy. **Positively prepared** - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements. The Plan refers to the objective assessment used but does not use it to allocate sites. **Justified** - the plan should be the most appropriate strategy based on a robust and credible evidence base. The Plan has a robust and credible evidence base but the strategy is inappropriate in not then making allocations.

**Effective** - the plan should be deliverable over its period. The Plan does not give a demonstrable commitment to delivery in respect of additional traveller sites **Consistent with national policy** - the plan should enable the delivery of sustainable development in accordance with the policies in the

National Planning Policy Framework. The Plan fails to meet Government Policy below in respect of 9a) b) and d) below. **Planning policy for traveller sites** Department for Communities and Local Government March 2012 states in the Chapter:- **Plan-making** Policy B: Planning for traveller sites 9. Local planning authorities should, in producing their Local Plan: a) identify and update annually, a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets (*not done*) b) identify a supply of specific, developable sites or broad locations for growth, for years six to ten and, where possible, for years 11-15 (*not done*) c) consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area (local planning authorities have a duty to cooperate on planning issues that cross administrative boundaries) (*probably not relevant in this case*) d) relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density (*not done*) e) protect local amenity and environment

**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.**

To make provision as a requirement of each of the housing allocations to provide a Gypsy and Traveller site for by adding this requirement after the provision of Affordable Housing "...with 30% being affordable housing and 1\*% comprising a site for gypsies and travellers in the context of Policy C2..." The provision of sites for gypsies and travellers should be required at each Strategic Housing Location and in each Masterplan. \*The percentage to be dependant on the findings of the Examination. *Note* In the event of suitable alternative provision being made elsewhere, the requirement to provide additional sites would be relaxed unless further studies reveal that additional provision is needed. **Reason** The Borough Council has made proposals for over 10,000 new homes plus 400 for the families of returning armed services but has excluded provision for the identified need (Paragraph 11.20) for 70\*\* gypsy and traveller pitches (less than 0.7% of the total provision). \*\* *subject to review*. The difficulty of making allocations is potentially very controversial and understandably very difficult for officers and elected Councillors of any Political Party in Stafford Borough. This may explain the omission, review and the deferral to a future DPD. The Borough Council has provided one site, at Glover Street, Stafford, for 14 traveller families - more than 30 years ago - and has subsequently consistently refused applications for additional sites - with those which are now provided by the private sector (more than 50 pitches) almost all having been allowed on appeal. Parts of each of the housing sites included as allocations at Strategic Development Locations in the plan would be equally suitable for Gypsy and Traveller sites and could meet Government policy in 'Planning policy for traveller sites', Department for Communities and Local Government, March 2012 which states in Paragraph 11:- Local planning authorities should ensure that traveller sites are sustainable economically, socially and environmentally. Local planning authorities should, therefore, ensure that their policies: a) promote peaceful and integrated co-existence between the site and the local community b) promote, in collaboration with commissioners of health services, access to appropriate health services c) ensure that children can attend school on a regular basis d) provide a settled base that reduces the need for long-distance travelling and possible environmental damage caused by unauthorised encampment e) provide for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well-being of any travellers that may locate there or on others as a result of new development f) avoid placing undue pressure on local infrastructure and services g) do not locate sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans h) reflect the extent to which traditional lifestyles (whereby some travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability. The identified Strategic Development Locations would meet all of these criteria.

*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

**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**

If the Inspector decides that the matter is to be considered at the EiP - rather than by written statements only. In order that the potential for change is fully debated.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr Paul Windmill
Comment ID	PS103
Response Date	21/02/13 16:15
Consultation Point	The Plan for Stafford Borough - Publication ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Consistent with national policy

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

Omission from the plan. The omission of any reference to the Government's proposals (National Policy) for HS2 - the proposed new rail line which will cross the Borough from Lichfield District entering the Borough in the south-east in Colwich Parish, travelling westward to pass to the north of Stafford town, then to the west of Stone town and northwards through Swynnerton Parish in the north-west of Stafford Borough into Newcastle-under-Lyme Borough. The proposal involves major capital infrastructure which will have a significant impact in the Borough as a whole and on landowners on, or close to, the route. I am not suggesting that the absence of any reference to HS2 makes the plan inherently unsound but simply that it would be desirable for users of the document if some reference were made to the potential impact of the route of HS2 in the Borough.

**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.**

Perhaps HS2 could be indicated in the Diagram in the Spatial Portrait section of the plan and a paragraph be added to the text of the document to explain the current situation and to make it clear that:-

- . HS2 is solely a proposal of National Government, that planning permission from the Council will not be needed as this will be granted via a hybrid Act of Parliament and
- . Inclusion on the diagram does not, of itself imply acceptance, or the support, of Stafford Borough Council

There appear to be no stations, service and repair areas or interchange points in or near Stafford Borough. The Examination should not need to involve any discussion of the merits of HS2 or its proposed route, even where it might impact or compromise proposals in the plan.

*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

**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**

If necessary - but as it is not a proposal of the Council I would not suggest that this is an appropriate matter to be heard at the Examination.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Sport England (Mrs Maggie Taylor)
Comment ID	PS104
Response Date	22/02/13 12:08
Consultation Point	8 POLICY STAFFORD 1 ? STAFFORD TOWN ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

Sport England welcomes Stafford's vision to provide high quality development with recreation, open space and sports provision and the key objective to include new communities supported by open space, sport and recreation facilities and new indoor and outdoor sports facilities to meet the needs of planned new populations. SP7 (i) is also supported in this vein and will help to deliver the national government aspiration for healthy communities as set out in NPPF. The Plan is based on a PPG17 open space, sport and recreation assessment and Sport England would want to be assured that the results of the review of that document, currently being undertaken, will be fully reflected in the plans policies and infrastructure plan as the plan develops to ensure compliance with NPPF Par 73. **Policy Stafford 1** recommends specific provision for sport and recreation including new indoor wet-side capacity (swimming pool), indoor multi-use specialist facility (sports hall? What specialism is proposed?) and improved access to multi-sport courts (Multi Use Games Areas), However other than MUGAs the

pool and sports hall are not mentioned in the Infrastructure Plan or linked to the Sports Facility Calculator in terms of the scale of development need generated by development or how they are to be funded? Where are they to be located? Should the Plan allocate land for these key leisure facilities and illustrate how/when they are to be delivered to ensure the proposal is robust and deliverable? Given these facilities are key to the broader community (being in Stafford County Town) should all housing growth across the County not contribute to their provision through pooled contributions? How is this achieved in the Plan - it is not quite clear? I am guessing it is via implementing the local standard and then applying the Sports Facility Calculator to identify the capital costs relating to the number of people in each housing area? In comparing the above policy to **Policy Stone 1 - Stone Town**, the latter refers to using the Sports Facility Calculator. This calculator works out demand for AGPs based on population growth and costs the capital cost of delivery. It does the same for swimming pools and sports halls which are required in Policy Stafford 1 and I wonder why it is not equally referred to in both policies? I would however guard against promoting the tool as providing a local evidence base on its own - this should be found in the updated strategy. The reason for advising that is that whilst it is very useful and robust in calculating demand arising from specific housing growth proposals it is NON SPATIAL and does not tell you whether existing facilities are in the right locations or have sufficient capacity to meet new demand. Neither does it account for demand/supply being imported/exported outside of the Borough - it is important to recognise that residents will travel to the nearest/nicest facilities and will not be bound by local authority boundaries.

[http://www.sportengland.org/facilities\\_planning/planning\\_tools\\_and\\_guidance/sports\\_facility\\_calculator.aspx](http://www.sportengland.org/facilities_planning/planning_tools_and_guidance/sports_facility_calculator.aspx)**Policy Stafford 1** makes no specific mention of any grass pitch provision required so I assume either there is no need for any grass pitches or the intention is to rely on implementation of standards? Whilst this is satisfactory there is a risk (along with the policy presumption in - see Policy xxx - to deliver facilities on site (as opposed to off site contributions). Major sports facilities cannot be delivered in this way but clear funding mechanisms, which pool contributions from all housing developments proposed, will be needed to help deliver these facilities. Playing fields/pitches can be delivered locally on site BUT there is a growing realisation that a thin spread of single pitch sites is difficult and expensive to maintain and manage and disadvantage sports delivery. If there is a shortfall of mini pitch sites - as stated ....xxx - then a network of strategic multi-sport pitch sites is generally preferred as that would be more sustainable/viable and can provide a broader/flexible sports offer supported by appropriate changing rooms/pavilion/car parking etc. to meet a mixture of club/community needs. Growth generally is also putting pressure on primary and secondary schools which on the one hand can help to provide co-located sports facilities of value to the community outside school hours. On the other hand the need to expand schools puts pressure on playing fields as new classroom blocks need to be built. It is important that school expansion is carefully considered so that this is avoided and that any new schools, if intended for key community use, provide more/better sports facilities than is normally the minimum specification for curricular needs to ensure there is capacity and they are fit for purpose (e.g. a new AGP on a school site will not need to be floodlit for curricular use but it will need to be used by the community outside of school hours in the winter months, also grass pitches (being a natural resource) can only sustain so much wear and tear before they become damaged therefore a greater playing field area is required above the minimum to provide capacity for the community). **This point equally applies to Policy Stafford xviii/Stafford 4/.**

**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.**

Clarity of the type, scale, location, funding calculations of key community sports facilities with clear links to the Infrastructure Delivery Plan and local standards set out in Appx G. Clarity of the need, or not, for new grass pitch provision and clear links to the infrastructure plan and local standards. To consider the need to identify a strategic network of playing field/multi-sport sites (as opposed to new pitches within individual housing developments) and if the result requires a new multi-sport site to include it in this (and/or other appropriate policies) and the infrastructure plan and/or allocate the sites. To identify which secondary schools are to be developed with significant community use provided and use policy to encourage expanded/improved provision to meet community needs as well as curricular needs.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Sport England (Mrs Maggie Taylor)
Comment ID	PS105
Response Date	22/02/13 12:08
Consultation Point	12 POLICY STONE 1 ? STONE TOWN ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

The policy is welcomed and supported, especially the specific proposals for sports infrastructure. Reference to the Sports Facility Calculator needs to be carefully addressed (see suggestion below and comments on Stafford Policy 1. Again it is correct to assume that no new playing fields/grass pitches are needed in this vicinity? Is it also correct to assume that Stone is the only area where a new AGP is proposed? This needs to be checked in the context of the new Sports Strategy as football is now moving away from using sand based pitches to using 3G which is increasing the demand for that type of artificial pitch. The AGP is not listed in the Infrastructure Plan for Stone and I would recommend it is. Is there a recommended location? Like playing fields it makes sense for such a facility to be located either on a key community sport school site so it can be utilised by the school as well as the community or within/as an extension to an existing/proposed community sports hub site. Attention is brought to the risk of locating AGPs on existing playing field as this is clearly protected under NPPF Par 74 and Sport England's policy to protect playing field.

**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.**

Reference to the Sports Facility Calculator as a tool to identify the scale of need generated by new resident in the housing allocation area(s) and the capital cost of provision. The actual amount of new provision (and therefore contributions) will depend on any spare capacity in any accessible current sports facilities. Contributions could be used, where space capacity exists, to improve the quality of facilities (to make it more attractive to new residents) or provide management resources (e.g. on a school to enable the hours of opening to be extended and make the facility available to the community).

Identify and allocate a location for the AGP. Consider the need to identify key strategic playing field sites/multi-sports sites which should be extended/improved/established as opposed to the development of single pitch sites within new housing development areas to minimise maintenance/management costs and provide more effective/viable/sustainable sports sites.

*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

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	Sport England (Mrs Maggie Taylor)
Comment ID	PS106
Response Date	22/02/13 12:08
Consultation Point	8.9 Paragraph ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

The housing allocation at H is not consistent with the plan 5 pages along named "Development to the West and South of Stone" . From our point of view it includes the playing field associated with Manor Hill First School, (although this is clearly not allocated within the strategic development site on the later plan.

**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.**

Remove the playing field from area H

*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

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	Sport England (Mrs Maggie Taylor)
Comment ID	PS107
Response Date	22/02/13 12:08
Consultation Point	30 Policy C7 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Consistent with national policy

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

Sport England welcome a specific policy on sport in the Plan which will contribute to delivering sustainable and healthy communities. The key considerations are to ensure the policy is informed by the local sports assessment (as currently being reviewed) and complies with NPPF (in particular Pars 73 and 74). Section a. is general and supported in principle and recognises a review of the Open Space Sport and Recreation Assessment is underway BUT as this has not been completed yet it is important that the specific requirements coming out of that are properly reflected in terms of proposals in the Local Plan going forward. Section b. clarifies that the local standards will be applied to any new housing development which is welcomed. Section C then refers to area specific proposals for open space ... open space only? What about other sport e.g. pool and new indoor facilities in Stafford? Sport England considers that this should be expanded to encompass all the new types of sports facilities across the Borough which equally need to be reflected in the Infrastructure Plan. It is also suggested that allocations for a new pool/leisure centre, AGPs and strategic playing field/sports hub sites should be considered if these are recommended outcomes of the sports strategy. This will help to identify an

accessible network of facilities across the Borough and provide local specificity and clarity. The general presumption that sports facilities (as opposed to general open space) will be provided on the development site is challenged. As explained in other responses a network of single pitch playing field sites is not efficient in terms of maintenance and management nor does it delivery the most effective sports development. The Council are encouraged to consider providing a network of strategic community sports hubs which are more sustainable/viable and better for providing sports development and that these type of facilities should not be considered as "an exception". Off site contributions are also vital for key built sports facilities such as swimming pools and leisure centres which will need several pooled contributions to support delivery. Development causing loss 'will be resisted' is weak compared to NPPF Par 74 stating "shall not be built on unless". This needs to be amended. Text also refers to "would not result in a deficiency" whereas NPPF 74 sates clearly shows .. building/land to be surplus' i.e. only if its surplus may there be a case for loss. Its loss may not cause a deficiency therefore just a balance of supply/demand. Furthermore bullet 3 in NPPF Par 74 is not reflected in the policy at all (this may for instance allow an AGP to be built on a grass playing field IF the need/supply data in the sports strategy supports it). I also attach a summary of what Sport England cosier are the implications of the NPPF for sport which you might find useful.

**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 Plan should identify specific proposals (reflected in the Infrastructure Plan) arising from the updated Sports Strategy to comply with NPPF Par 73. It is suggested that off site contributions are acceptable for strategic sports facilities such as multi-sports hubs and major built sports facilities. Amend the policy to reflect NPPF Par 74 to ensure sports facilities 'shall not be built on unless' one of the three exceptions is met.

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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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Sport England (Mrs Maggie Taylor)
Comment ID	PS108
Response Date	22/02/13 12:08
Consultation Point	11.22 Paragraph ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

Par 11.22 refers to the opportunity to allocate open space through Neighbourhood Plans. Whilst this has merits it does not facilitate a strategic approach to playing field provision which should look at overall distribution and access as well as perhaps providing a network of strategic sites in preference to several single pitch sports? If there is merit in a few strategic sports hub sites then perhaps these should be considered for allocation in the Plan itself. The last bullet identifies the need to address a shortfall in mini soccer pitches. Again this type of game needs to be played on a site with several mini soccer pitches as the matches take place in a format which needs several games being played at one time in a form of tournament. Provision therefore needs to reflect this requirement.

**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.**

Consider the need to allocate sports hub sites. Encourage provision of multi-pitch mini soccer site(s)

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Sport England (Mrs Maggie Taylor)
Comment ID	PS109
Response Date	22/02/13 12:08
Consultation Point	11.23 Paragraph ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

Relying on the provision of local standards alone might not address any needs to provide multi-sports hubs as a strategic network of facilities which are more economic to delivery, maintain and manage. This should be considered alongside the use of local standards providing certainty as to where and how the contributions should be spent to get best value for money.

**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.**

Consideration of making allocations for strategic multi-pitch/sports hubs.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Sport England (Mrs Maggie Taylor)
Comment ID	PS110
Response Date	22/02/13 12:08
Consultation Point	40 Policy I1 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

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

The principles of the policy are supported but not all of the sports facilities identified as required in policy are included in the Infrastructure Delivery Plan and this needs to be updated to reflect the revised sports strategy (currently being undertaken).

**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.**

To update the IDP to include all new sports infrastructure identified in the Sports Strategy and 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?** No, I do not wish to participate at the examination in public

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Sport England (Mrs Maggie Taylor)
Comment ID	PS111
Response Date	22/02/13 12:08
Consultation Point	13.24 Paragraph ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Consistent with national policy

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

The list does not include major sports facilities which have a critical part to play in delivering healthy communities.

**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.**

To include major sports facilities.

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

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Sport England (Mrs Maggie Taylor)
Comment ID	PS112
Response Date	22/02/13 12:08
Consultation Point	16 Appendix A - Local Plan Evidence Base ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

This needs to be updated to include the new sports strategy which replaces the PPG17 Open Space, Sport and Recreation Assessment 2009.

**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.**

As above

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Sport England (Mrs Maggie Taylor)
Comment ID	PS113
Response Date	22/02/13 12:08
Consultation Point	19 Appendix D- Infrastructure ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Consistent with national policy

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

The infrastructure lists do not appear (subject to updates from revised Sports Strategy) to include all the recreation provision as expected by NPPF Par 73. No mention is made of playing fields or built sports facilities for instance? The capital cost of MUGAs in 'unknown' whereas if you know how many you need in which areas Sport England costings can provide estimated costs: e.g. 36.6x21.35m macadam fenced floodlit MUGA is 115,000 or a 40x18m polymeric surface fenced floodlit MUGA is 160,000 (see additional costings on our website (this is kept up to date quarterly). [http://www.sportengland.org/facilities\\_\\_planning/design\\_and\\_cost\\_guidance/cost\\_guidance.aspx](http://www.sportengland.org/facilities__planning/design_and_cost_guidance/cost_guidance.aspx) No mention is made of the need for each area of housing growth to contribute the new pool and multi-use specialist sports hall in Stafford - should this not feature in the Infrastructure Plan?

**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 above

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Sport England (Mrs Maggie Taylor)
Comment ID	PS114
Response Date	22/02/13 12:08
Consultation Point	22 Appendix G- Local Space Standards ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

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

The standards are generally welcomed and provide a useful means to estimate provision from development however the outcomes of the Sports Strategy also need to be reflected more accurately in policy and the infrastructure delivery plan to meet the requirements of NPPF 73. ATPs - up to 6 additional ATPs and two half size AGPs are said to be needed. Only one of these is referred to in policy - where are the others needed? More local specificity is required and this needs to be reflected in policy to ensure NPPF Par 73 is met. Grass Pitches - the amount/type of grass pitches needed will vary according to the catchment areas from the sports assessment. Is there a need to provide for catchment variations (which perhaps reflect current deficits) but also reflect current supply and new demand and is there a need to consider the distribution of playing fields in the light of comments relating to sports hub sites? Indoor sports hall and swimming pool have been broadly identified in Stafford but

if there is a need for more indoor tennis where is this to be located? There is provision in Stafford so perhaps a location should be identified for this facility to add local detail and certainty?

**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 ensure major facilities, related to the identified standards, are reflected in policy and the IDP.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Miss Sheila Moulton
Comment ID	PS115
Response Date	22/02/13 15:15
Consultation Point	5 Spatial Vision and Key Objectives ( <a href="#">View</a> )
Status	Processed
Submission Type	Letter
Version	0.4
Files	<a href="#">PS 115 S Moulton Gnosall Map.pdf</a>

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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

I am writing in reply to a letter I received, dated 11th January 2013, regarding the Plan for Stafford Borough - Publication and the associated Revised Sustainability Appraisal Report.

Having sat in the Council Offices, for a number of hours, perusing the above documents, I noted that the Plan proposes that there will be a total requirement for 1200 homes in the Key Service Villages, of which Gnosall is one. According to the figures quoted, 99 homes had been completed by 31/3/2012, current commitments were 472 leaving 629 to still be provided.

I have also met with members of Gnosall Parish Council, as recommended, to discuss the publications in more detail.

I have lived in the hamlet of Audmore (to the east of Gnosall) for just under 60 years and still own approximately 4 hectares of land there. I believe the the field No. 3840 is located in the GN2 area referred to in the Revised Sustainability Appraisal Report January 2013.

One of the Key Objectives outlined on page 20 of the Plan, for areas outside Stafford and Stone is "to provide high quality, new, small scale housing development at appropriate villages that reflects their distinctive local character". As the land, coloured in orange on the enclosed map, is surrounded by a variety of building already and that a large section of it is adjacent to a road, this may be a suitable area worth considering.

I am prepared to negotiate the sale of the field if required.

MAP OF AUDMORE Gnosall

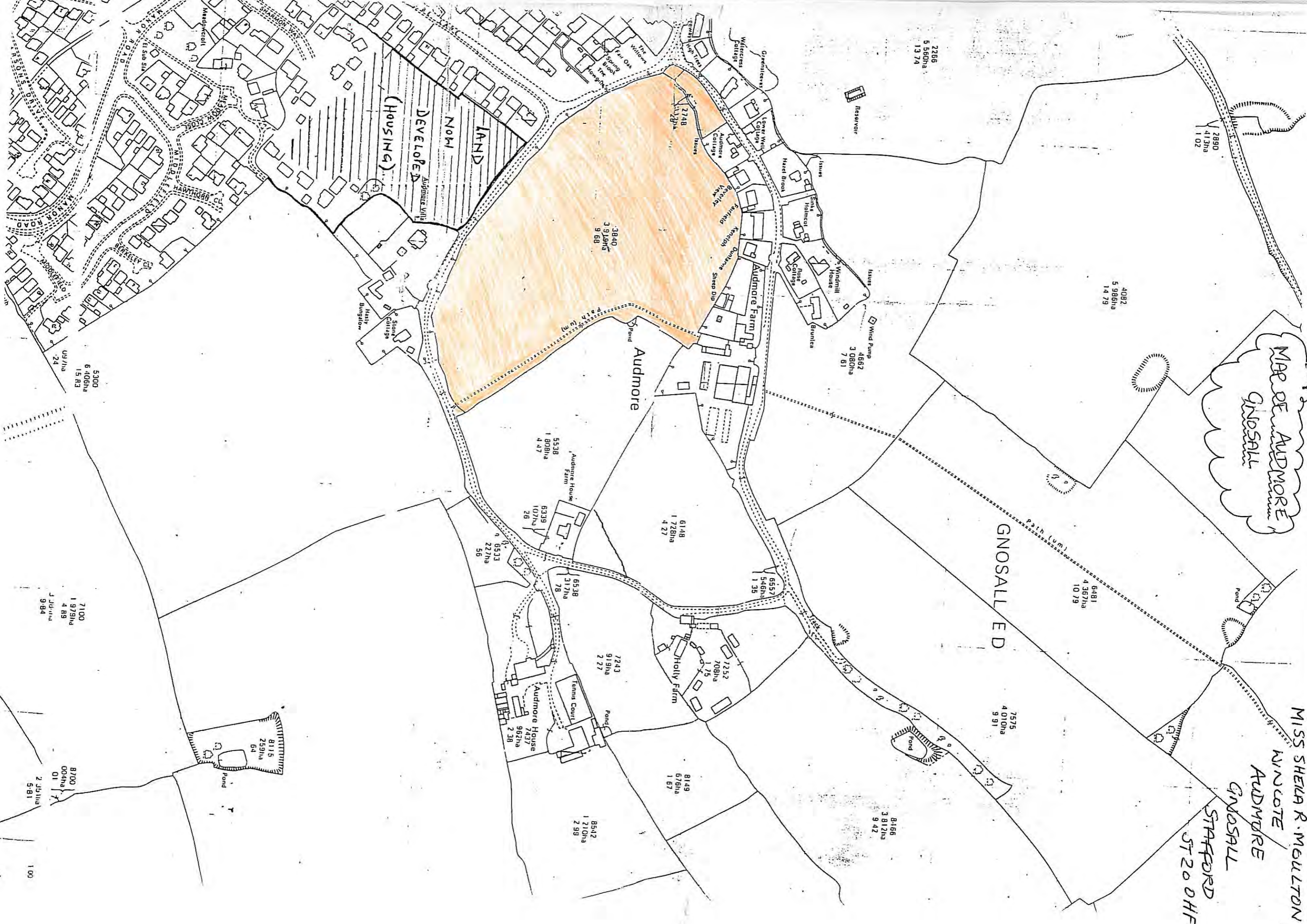
MISS SHEILA R. MULLTON

WINDCOTE  
AUDMORE

GNOSALL

STAFFORD

ST20 0HF



LAND  
DEVELOPED  
(HOUSING)

GNOSALLED

Audmore

Audmore Farm

Holly Farm

Audmore House

Tennis Court

Audmore House

2266  
5 560ha  
13 74

2890  
413ha  
1 02

4082  
5 985ha  
14 79

4662  
3 080ha  
7 61

5300  
6 406ha  
15 R3

5538  
1 808ha  
4 47

6148  
1 728ha  
4 27

6481  
4 367ha  
10 79

7575  
4 010ha  
9 91

7100  
1 979ha  
4 R9

6339  
1 077ha  
26

6557  
546ha  
1 35

7243  
919ha  
2 27

8149  
576ha  
1 67

8166  
3 812ha  
9 42

8542  
1 210ha  
2 99

8115  
259ha  
64

8700  
1 004ha  
01

1 00

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Cheryl Hyland
Comment ID	PS116
Response Date	22/02/13 15:42
Consultation Point	3 SPATIAL PRINCIPLE 3 (SP3) ? STAFFORD BOROUGH SUSTAINABLE SETTLEMENT HIERARCHY ( <a href="#">View</a> )
Status	Processed
Submission Type	Letter
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

I am pleased to comment on the above publication. It clearly lays out the future needs of the borough and the proposed planning policies that should be employed to realise these goals.

In recognising Eccleshall as a Key Service Village, having significant levels of services and facilities for a relatively small population, the publication highlights Eccleshall and I hope will use it as an example of what may be achieved.

Working with Stafford's planning officers under existing regulations we already enjoy a thriving business community. Key facilities such as the Crown Surgery, dentists, optician etc that have all sympathetically converted listed High Street property to maintain presences at the centre of the community. This, together with the activities of a very committed residential sector, has over the last ten years maintained



and enhanced Eccleshall. Therefore, I welcome the proposals to continue to protect green space and allow only small scale appropriate housing development as Eccleshall is an irreplaceable asset to Staffordshire's beauty.

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd ( )
Comment ID	PS117
Response Date	22/02/13 16:28
Consultation Point	3.13 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

The commitment of the Borough to "neighbourhood planning" under the provisions of the Localism Act are supported. The Borough Council will need to be mindful that the appropriate bodies, forums and Parishes expedite these plans in conformity with the overall planning strategy. If neighbourhood plans are not forthcoming and fail to deliver provision for housing, employment and retail development the economic prosperity and social cohesion of the Borough could be compromised. There is support for the instigation of Site Allocation Plans should neighbourhood plans not succeed.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Trine Developments ( )
Comment ID	PS118
Response Date	22/02/13 16:01
Consultation Point	The Plan for Stafford Borough - Publication (pre-submission) ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

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

The Housing Growth Distribution set out in SP4 is considered to be realistic and appropriate. However, the overall housing target of 10,000 dwellings is considered to represent a serious underestimate of needs and, if maintained, will lead to a serious undersupply of housing across the Borough and a failure to meet local needs. This will be particularly acute in Stafford where there is the added pressure upon local housing arising from the expansion of the MoD base in the Town and the short-term increase in housing needs of over 500 dwellings. It is considered that the Housing Needs set out in the Local Plan are based upon historic trajectories as opposed to more up to date needs analyses. Indeed, a recent planning appeal (APP/Y3425/A/12/2172968 - SBC PA Ref:11/15998/OUT) found that the Framework requires Local Planning Authorities to meet the full, objectively assessed needs for housing

within the housing market area. With regard to Stafford Borough the Inspector found that the Local Plan was not based upon the most up to date data or assessment of need and that the West Midlands RSS Phase II Revision Panel Report figures should be used instead. This data suggests a figure of 550 units pa - or a total figure of 11,000 houses over the Plan Period. It is considered that the housing figure advanced in the emerging Local Plan is not based upon an up to date or proper assessment of housing need for Stafford Borough. It is considered that the RSS Phase II data is more reliable and, therefore, a minimum target of 11,000 additional housing units should be defined **plus** an explicit allowance for an additional 500 homes to meet the needs of the MoD. Having regard to the timescale for the MoD's expansion, it should be noted that the MoD requirement should be met within the period up to 2016.

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***" Stafford Borough will accommodate new growth and investment over the plan period. Throughout the Borough provision will be made for the development of a minimum of 550 dwellings per year over the plan period, plus an additional 500 units to meet military housing needs which are to be provided by 2016, and provision for gypsies, as well as approximately 8 hectares per year of employment land, to provide for the future needs and prosperity of residents ."***

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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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Barratt Homes (trading as BDW Trading) Ltd ( )
Comment ID	PS119
Response Date	22/02/13 16:50
Consultation Point	8 POLICY STAFFORD 1 ? STAFFORD TOWN ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

The focus of the substantial majority of housing development in the Borough in three strategic locations in Stafford town is not supported. The evidence base and in particular the Borough Councils Sustainability Appraisal and the Habitats Regulation Assessment cannot be taken to reasonably conclude that focussing major development in only three main locations was the optimal strategy in terms of key regeneration, sustainability and planning objectives.

There is a significant risk to the delivery of housing with reliance on these limited strategic locations particularly in relation to mitigating the impact on the highway network and providing funding for adequate education facilities. The Boroughs work on the viability of infrastructure to support major development could not be interpreted to conclude that this strategy will be effective in delivering for future housing and employment 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?** Yes, I wish to participate at the examination in public

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr Tom Kelt
Comment ID	PS120
Response Date	25/02/13 09:12
Consultation Point	5.2 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

- . Positively prepared
- . Justified
- . Effective

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

Point 14 states that a new Health Centre will be delivered for Stone. However in section 8 where Stone developments are described in detail, there is no mention of a new Health Centre, why it is required or where it will be developed. The document is therefore inconsistent.

**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.**

Remove point 14 from the section.



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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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr Tom Kelt
Comment ID	PS121
Response Date	25/02/13 09:19
Consultation Point	12 POLICY STONE 1 ? STONE TOWN ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Justified  
. Effective

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

In the section on Stone Town Centre point a) includes "provision for mixed use development at Westbridge Park". There is no specific statement in the plan as to why this is required, i.e. there is no statement of what is planned to be developed in the park. Nor is there anywhere in the plan that defines what area Westbridge Park covers and therefore how much land is to be "mixed use".

**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.**

Remove this statement from the plan.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr Tom Kelt
Comment ID	PS122
Response Date	25/02/13 09:28
Consultation Point	8.13 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Justified  
. Effective

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

The WYG report provided in evidence (appendix A) assumes that the shopping preferences of a sample weighted heavily to Stone Town (86.5% of the sample) can be applied to the total population of zone 2 which is twice the size of the Stone town population. This is unlikely to be an accurate calculation of the shopping preferences in zone 2, where many residents will be more likely to shop in Stafford, Newport or Stoke-on-Trent depending on geography. Therefore the statement "current over-trading" is incorrect and there is no demonstrable need for another super-market.

**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.**

Remove the references to the need for additional convenience retail floor-space.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr Tom Kelt
Comment ID	PS123
Response Date	25/02/13 09:38
Consultation Point	8.13 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

- . Positively prepared
- . Effective

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

The Policy Stone 1 section states that Stone requires 2,200 square metres of comparison retail space. However this section (8.13) states that the total requirement for the borough will be 2230 sq m by 2026 and that there is no significant need for comparison retail floorspace in Stone.

These statements are inconsistent.

**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.**

Remove the references to comparison floorspace from the Policy Stone 1 and from 8.13 sections.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd ( )
Comment ID	PS124
Response Date	25/02/13 11:25
Consultation Point	4.1 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

The Key Issues and Challenges identified by the Borough Council are generally supported. In particular analysis of the evidence base supporting the Submission Plan would suggest that delivering and appropriate level of new housing in the Borough is critical in meeting the needs and aspirations of the future population.

All other factors being equal the relationship of average household incomes to average house prices in the Borough clearly indicate a need to incrementally increase housing supply. There is a need to recognise the requirements of the whole population and ensure that there is a spatial distribution of new housing provided across the main town of Stafford, Stone and the identified key service villages.

There is a wealth of evidence to show that the provision of affordable housing is an important tenet of planning for cohesive and prosperous communities and retaining a young working population. Affordable



housing is needed in all of the Boroughs settlements if the local population are to be given the opportunity of adequately providing for their housing needs. Current government policy and funding for social and affordable housing suggest that securing affordable housing through the provision of open market housing will remain a critical course of delivery over the plan period.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	J Ross Developments (Mr Nick Scott)
Comment ID	PS125
Response Date	25/02/13 11:26
Consultation Point	2.5 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

This paragraph is far from clear.

**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.**

Rewrite so that it is clear what proportion of the housing stock is vacant.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd ( )
Comment ID	PS126
Response Date	25/02/13 11:26
Consultation Point	5.1 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

The key objectives are supported in particular points 21, 22 and 25. In relation to key objective 25 the recognition that the provision of open market and affordable housing in the Key Service Villages in supporting viable, sustainable and prosperous rural communities is supported.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd ( )
Comment ID	PS127
Response Date	25/02/13 11:28
Consultation Point	1 SPATIAL PRINCIPLE 1 (SP1) - PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

The recognition of the National Planning Policy Framework and the presumption in favour of sustainable development is welcomed.

This central tenet of national planning policy is recognised by the government as vital in assisting to ensure that the planning system contributes to rather than frustrates the provision of sustainable communities and economic prosperity. The government strongly supports local authorities that recognise the housing needs of their communities and the need to bridge the gross under-provision of new homes to meet demand over the last two decades that has contributed to an affordability crisis with many young families being priced out of the housing market in the long term. One solution among others is

to ensure that the planning system provides an adequate supply of good sites for new residential development.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd ( )
Comment ID	PS128
Response Date	25/02/13 11:29
Consultation Point	2 SPATIAL PRINCIPLE 2 (SP2) ? STAFFORD BOROUGH HOUSING & EMPLOYMENT REQUIREMENTS ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

This policy objective of providing development land to provide 500 dwellings per year across the Borough is supported. In the light of evidence in relation to housing need, affordable housing requirements and market house prices it is suggested that land for 500 dwellings per annum is viewed as a minimum requirement.

Failure to deliver a sustainable level of new housing will have serious adverse implications for the prosperity, social and economic well-being of the residents of the Borough.



*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	J Ross Developments (Mr Nick Scott)
Comment ID	PS129
Response Date	25/02/13 11:31
Consultation Point	2.19 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Effective

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

Are 2011 census figures available? This may be important given that nationally these figures showed a marketed increase over 2010 mid-year estimates. The use of 2001 figures will undermine the base of the Plan if the 2011 are significantly different.

**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.**

Use up to date figures.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	J Ross Developments (Mr Nick Scott)
Comment ID	PS130
Response Date	25/02/13 11:36
Consultation Point	2.24 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

Very interesting but this is not a tourist guide.

**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.**

Delete all but the first sentence.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	J Ross Developments (Mr Nick Scott)
Comment ID	PS131
Response Date	25/02/13 11:44
Consultation Point	3.1 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

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

It is not clear how the strategy has been determined locally. The strategy of the WRSS appears to have been retained with the Borough accepting high levels of in-migration. We are not opposed to the figures per se but are of the opinion that the situation post WMRSS is properly explained.

**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.**

Explain the post WMRSS situation with regards to growth targets more fully.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	J Ross Developments (Mr Nick Scott)
Comment ID	PS132
Response Date	25/02/13 12:04
Consultation Point	3.8 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Justified

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

Previous comments regarding the post WMRSS apply with regards to housing markets.

**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 housing need in terms of these housing markets should be more fully explained.



*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd ( )
Comment ID	PS133
Response Date	25/02/13 12:14
Consultation Point	3 SPATIAL PRINCIPLE 3 (SP3) ? STAFFORD BOROUGH SUSTAINABLE SETTLEMENT HIERARCHY ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

- . Positively prepared
- . Justified

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

This principle of the settlement hierarchy is generally supported. It is agreed that housing and employment growth should be balanced and that the strategy should as far possible provide the conditions to develop the Borough to allow for a high degree of self-containment in terms of housing, employment, schools and other education facilities while offering the population housing choice. The recognition of Eccleshall as a Key Service Village is welcomed.

It is noted that the Borough Council revised the 'Settlement Assessment of Services and Facilities' in May 2012. The assessment details the services and facilities in the village including two medical practices, six food stores, 23 non-convenience shops, two educational facilities, a Post Office, seven pubs, three churches, nine food takeaways and cafes and numerous recreational facilities. As a

significant contributor to reducing the need for travel and improving the conditions for self-containment the village has also recently benefitted from the opening of a mid-sized supermarket.

None of the other settlements in the Borough identified as Key Service Villages provide as many and as varied service and facilities offer as Eccleshall and the centre of the village is comparative to that of a small town with a much larger population. Eccleshall already provides a good level of services to its community and additional housing development will help to retain and improve these services and facilities.

Analysis of the services and facilities in other Key Villages identifies some considerable shortcomings and it is not considered possible that within the development allocation of housing for the Borough enough development could be focussed in these villages to make a substantive difference to supporting facilities and services. Hixon has only two shops, no GP, no bank and no petrol filling station. Great Haywood has only three shops, no bank and no petrol filling station. Little Haywood and Colwich has only two shops, no GP, no bank and no petrol filling station. Haughton has only three shops, no GP, no bank and no petrol filling station. Weston has only one shop, no GP, no bank and no petrol filling station. Woodseaves has only one shop, no GP, no bank and no petrol filling station.

It is considered that on the basis of population size, the presence of critical facilities to contribute to sustainable communities (schools and medical facilities) and the level of general service and facilities provision the villages of Eccleshall and Gnosall should be recognised as at a higher level in the settlement hierarchy than the nine other key service villages.

It is also considered in the context of the overall strategy and the objectives of regeneration and Green Belt protection in North Staffordshire that the villages of Barlaston, Tittensor and Yarnfield are distinguished as being less suitable for the location of new housing and employment development.

The Spatial Principle 3 (SP3) should be redrafted;

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

- 1. County Town of Stafford*
- 2. Market Town of Stone*
- 3. Main Key Service Villages of Eccleshall and Gnosall*
- 4. Key Service Villages of Hixon, Great Haywood, Little Haywood / Colwich, Haughton, Weston and Woodseaves*

**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 Spatial Principle 3 (SP3) should be redrafted; The majority of development will be delivered through the Sustainable Settlement Hierarchy based on the following areas:*

- 1. County Town of Stafford*
- 2. Market Town of Stone*
- 3. Main Key Service Villages of Eccleshall and Gnosall*
- 4. Key Service Villages of Hixon, Great Haywood, Little Haywood / Colwich, Haughton, Weston and Woodseaves*

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd ( )
Comment ID	PS134
Response Date	25/02/13 12:16
Consultation Point	6.28 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Positively prepared  
. Justified

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

The recognition of Eccleshall as a Key Service Village is welcomed and supported. It is noted that the Borough Council revised the 'Settlement Assessment of Services and Facilities' in May 2012. The assessment details the services and facilities in the village including two medical practices, six food stores, 23 non-convenience shops, two educational facilities, a Post Office, seven pubs, three churches, nine food takeaways and cafes and numerous recreational facilities. As a significant contributor to reducing the need for travel and improving the conditions for self-containment the village has also recently benefitted from the opening of a mid-sized supermarket.

None of the other settlements in the Borough identified as Key Service Villages provide as many and as varied service and facilities offer as Eccleshall and the centre of the village is comparative to that of a small town with a much larger population. Eccleshall already provides a good level of services to

its community and additional housing development will help to retain and improve these services and facilities.

Analysis of the services and facilities in other Key Villages identifies some considerable shortcomings and it is not considered possible that within the development allocation of housing for the Borough enough development could be focussed in these villages to make a substantive difference to supporting facilities and services. Hixon has only two shops, no GP, no bank and no petrol filling station. Great Haywood has only three shops, no bank and no petrol filling station. Little Haywood and Colwich has only two shops, no GP, no bank and no petrol filling station. Haughton has only three shops, no GP, no bank and no petrol filling station. Weston has only one shop, no GP, no bank and no petrol filling station. Woodseaves has only one shop, no GP, no bank and no petrol filling station.

It is considered that on the basis of population size, the presence of critical facilities to contribute to sustainable communities (schools and medical facilities) and the level of general service and facilities provision the villages of Eccleshall and Gnosall should be recognised as at a higher level in the settlement hierarchy than the nine other key service villages.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd ( )
Comment ID	PS135
Response Date	25/02/13 12:18
Consultation Point	6.41 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

- . Positively prepared
- . Justified
- . Effective

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

Past development rates in the some of the rural parts of the Borough and in the Key Service Villages have been demonstrably more successful than in Stafford town. This is in a period when considerable public investment has been made in the County town to provide infrastructure and support the town centre. Much of the recent housing development in the town has been supported by regeneration initiatives and large scale public investment. Housing development in Stafford has provided a negligible and in many cases no contribution to affordable housing and other social infrastructure.

It is considered that there is again significant risk to the delivery of housing in Stafford with reliance on three strategic locations particularly in relation to mitigating the impact on the highway network and providing funding for adequate education facilities. The Boroughs work on the viability of infrastructure

to support major development could not be interpreted to conclude that this strategy will be effective in delivering for future housing and employment 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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd ( )
Comment ID	PS136
Response Date	25/02/13 12:20
Consultation Point	6.49 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

- . Positively prepared
- . Justified
- . Effective

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

It is unclear what the purpose of a statement on a development moratorium is in the context of the Submission Plan and the anticipation of neighbourhood or site allocation plans. If the Plan has been positively prepared and is considered justified and effective there should not be any reason to instigate a development moratorium. The failure to achieve the planned level of development in Stafford is likely to be a consequence of the over reliance on three major strategic development locations and the control of housing supply by a limited number of developers. It is not accepted that this can be robustly monitored and that the planning authority can adequately ascertain what the causes of delivery failure might be. Any monitoring of development rates needs to be accompanied by continual review and assessment of the funding and commitment to provide physical and social infrastructure.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	J Ross Developments (Mr Nick Scott)
Comment ID	PS137
Response Date	25/02/13 12:20
Consultation Point	3.10 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Justified

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

What does 'substantial additional development' amount to?

A significant amount of those living in the North Staffordshire conurbation with sufficient purchasing power have always and will continue to seek to live in the surrounding areas. Work to restore the housing market in and around Stoke is moribund and in any event was largely effective only at the lower end of the housing market. Building less houses will not affect demand it will merely add to price pressures in those areas such as Stone and Eccleshall that are within easy commuting distance from the Potteries.

The growth strategy quite rightly places Stone behind Stafford in the hierarchy. How is this sentence consistent with the amount of new housing allocated to Stone?

We would support a strategy that recognises the inevitable pressure on the housing market from the Potteries with a more realistic analysis of the effects of this demand. Clearly there is a balance to be struck and this should be properly explained.

**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.**

Either delete the last sentence or explain more fully in terms of the overall distribution of growth.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd ( )
Comment ID	PS138
Response Date	25/02/13 12:21
Consultation Point	6.52 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Justified

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

It is agreed that the SHLAA is a key evidence base to the strategy as required by national policy. Although the Borough Council has diligently produced the SHLAA on an annual basis a substantial proportion of the information put forward by landowners, agents and developers is out of date.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd ( )
Comment ID	PS139
Response Date	25/02/13 12:22
Consultation Point	7 SPATIAL PRINCIPLE 7 (SP7) ? SUPPORTING THE LOCATION OF NEW DEVELOPMENT ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

The principles outlined in the policy are supported.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd ( )
Comment ID	PS140
Response Date	25/02/13 12:26
Consultation Point	8 POLICY STAFFORD 1 ? STAFFORD TOWN ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

- . Positively prepared
- . Justified
- . Effective

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

The focus of the substantial majority of housing development in the Borough in three strategic locations in Stafford town is not supported. The evidence base and in particular the Borough Councils Sustainability Appraisal and the Habitats Regulation Assessment cannot be taken to reasonably conclude that focussing major development in only three main locations was the optimal strategy in terms of key regeneration, sustainability and planning objectives. There is a significant risk to the delivery of housing with reliance on these limited strategic locations particularly in relation to mitigating the impact on the highway network and providing funding for adequate education facilities. The Boroughs work on the viability of infrastructure to support major development could not be interpreted to conclude that this strategy will be effective in delivering for future housing and employment need.

There is limited information in the plan and supporting evidence (including the Colin Buchanan Infrastructure Delivery Plan report, July 2012) to suggest that funding and delivery mechanisms for the Western Access Improvement Scheme or the Eastern Access Improvement Scheme are secure. It is further noted that the traffic modelling for the North of Stafford has been predicated on an allocation of 2,000 dwellings and not 3,100 dwellings as now proposed.

It is clear capital funding towards the Western Access Improvement Scheme has been rejected by government on a number of occasions most recently under a major scheme bid to DfT at a time when the Borough was receiving considerable additional funding for infrastructure from DCLG with the town recognised as a growth point. Without a much more robust funding mechanism being identified or a much greater contribution being secured from the developer consortium it is difficult to envisage how the Western Access Improvement Scheme can be delivered and over what time period. At the best it would appear that development west of Stafford should only be recognised as viable later in the plan period and beyond 2021 at the earliest.

The provisions of the policy in relation to the Western Access Improvement Scheme are inconsistent with previous planning strategies, the rescinded Staffordshire and Stoke-on-Trent Structure Plan 1996-2011 and the Staffordshire Local Transport Plan 2011 - Strategy Plan (Box 1.11 p.19). A western access scheme that links Martin Drive to Doxey Road will serve little purpose in terms of alleviation of congestion or removing traffic from the town centre.

The major development allocation west of Stafford should be predicated on securing adequate transport infrastructure as has been envisaged by every planning strategy, LTP and growth point bidding document prior to the drafting of this Submission Plan.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd ( )
Comment ID	PS141
Response Date	25/02/13 12:32
Consultation Point	9 POLICY STAFFORD 2 ? NORTH OF STAFFORD ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

- . Positively prepared
- . Justified
- . Effective

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

The Borough Council is relying on a single allocation to the North of Stafford to deliver over two-fifths (43%) of the housing allocation for the whole town until 2031. There is no clear evidence to show that this allocation is viable and it is a high risk strategy to rely on such significant development in one location where housing delivery can be controlled by the landowner or a developer consortia. The access and transport strategy relating to the delivery of the major strategic development allocation North of Stafford is not clearly defined or consistent with a robust delivery mechanism. There is little evidence to suggest that adequate transport modelling has been done to assess the impact of the housing and employment allocations on the highway network. The Colin Buchanan Infrastructure

Delivery Plan report, July 2012, indicates that the allocation North of Stafford has been predicated on an allocation of 2,000 dwellings and not 3,100 dwellings as now proposed.

The strategy for the development North of Stafford appears to indicate that the Borough is planning for an independent community rather than a development that will integrate with and be part of Stafford town. This vision is amplified by the location north of Beaconside beyond the ring-road which has provided a defensible and obvious boundary for the town for more than three decades.

The existing employment development at Redhill is very poorly integrated with the town and lacks any obvious visible, transport or geographic references that suggest it is part of Stafford town. This is further amplified by the very distant new main access to the site which is 300-400m north off the A34.

The north of Stafford allocation represents a very significant incursion into open countryside and lacks clearly defensible development boundaries to the north and east. The impact of development here will be visually highly intrusive in the open landscape north of town.

The Initial Preferred Route for HS2 Phase 2 to Manchester is shown to pass within less than 200 metres of the northern boundary of the North of Stafford strategic allocation.

Reduce the scale the development allocation North of Stafford to 1,500 to 2,000 dwellings and incorporate mitigation measures to limit the impact of the proximity to the Preferred HS2 line with consequential amendment to the supporting text and justification.

The Adopted Stafford Borough Local Plan Proposals Plan very clearly shows that land to the south of Marstongate Farm is an area of significant biological importance. This land provides a green lung for the town and should be regarded as a critical element of green infrastructure linking with Stafford Common and open land to the south of Beaconside.

A much more concerted effort should be made to protect this land from development and enhance the ecological and biological linkages across the ring road. Marston Brook is a natural water corridor to the east of Marston Lane which by the redrawing of the allocation boundary in the plan submission process has been incorporated into the strategic development allocation. The enlargement of the strategic allocation boundaries North of Stafford both east and west of Marston Brook and the considerable encroachment into the area of biological importance gives the community of Stafford no confidence that the Borough Council has properly considered how this development should be assimilated into its natural surroundings.

It is recommended that scale the development allocation North of Stafford should be substantially reduced to between 1,500 to 2,000 dwellings and incorporate mitigation measures to reflect the biological importance of the site and its wider linkages. It is suggested an area of biological enhancement should be indicated on both sides of Marston Brook and an area for environmental improvement and recreation be identified to separate the allocated development areas by a minimum of 300m.

**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.**

Reduce the scale the development allocation North of Stafford to 1,500 to 2,000 dwellings and incorporate mitigation measures to limit the impact of the proximity to the Preferred HS2 line with consequential amendment to the supporting text and justification.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd ( )
Comment ID	PS142
Response Date	25/02/13 12:35
Consultation Point	10 POLICY STAFFORD 3 ? WEST OF STAFFORD ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Positively prepared  
. Justified

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

There is limited information in the plan and supporting evidence (including the Colin Buchanan Infrastructure Delivery Plan report, July 2012) to suggest that funding and delivery mechanisms for the Western Access Improvement Scheme are robust and secure. It is clear capital funding towards the Western Access Improvement Scheme has been rejected by government most recently under a major scheme bid to DfT at a time when the Borough was receiving considerable additional funding for infrastructure from DCLG with the town recognised as a 'growth point'. Without a much more robust funding mechanism being identified or a much greater contribution being secured from the developer it is difficult to envisage how the Western Access Improvement Scheme can be delivered and over what time period.

At the best it would appear that development west of Stafford should only be recognised as viable later in the plan period and beyond 2021 at the earliest.

The policy under point xiii only refers to the delivery of phase 1 of Western Access Improvement Scheme whereas in other documents and in policy 1 Stafford Town it is clear the Borough Council is committed to a wider highway improvement scheme. Apart from allowing immediate access to the major site it is difficult to assess what phase 1 of the Western Access Improvement Scheme could achieve in isolation. It does not appear to contribute to any wider transport strategy that would be of benefit to the circulation of traffic in the town or the possibility of removing traffic from the town centre.

At the best it would appear that development west of Stafford should only be recognised as viable later in the plan period and beyond 2021 at the earliest.

**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.**

West of Stafford should only be recognised as viable later in the plan period and beyond 2021 at the earliest.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd ( )
Comment ID	PS143
Response Date	25/02/13 12:37
Consultation Point	17 Policy E4 ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

The provisions of the policy are supported.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd ( )
Comment ID	PS144
Response Date	25/02/13 12:39
Consultation Point	25 ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Justified

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

The affordable housing targets set out in policy C2 are unreasonable and unviable and do not relate to the Borough Councils evidence base. There are very few parts of the country where the development economy is buoyant enough to be able to deliver this level of affordable housing and there is no evidence in Stafford Borough that suggests it could reasonably be delivered here. The caveat that developers will be released of their affordable housing provisions by submission of economic viability assessments is a weak element of the policy that will complicate and protract the planning process at the application stage. A much preferred approach would be for the Borough Council to set much more realistic affordable housing requirements that have some chance of being achieved.

It is not considered that the level of cross-subsidisation from open market housing to affordable housing provision that would be required to deliver these thresholds of 30% and 40% is in anyway reasonable. The population seeking to purchase open market housing are being burdened with an unreasonable

additional development cost. The Borough is risking diverting a considerable amount of investment and meeting the aspirational need of the population to reasonably afford and meet their housing requirements in the open market.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd ( )
Comment ID	PS145
Response Date	25/02/13 13:05
Consultation Point	6.28 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

In terms of possible directions for a sustainable extension for Eccleshall it should be recognised that there is limited land to the north between the recognised floodplain of the river Sow and the edge of the village. Any development to the north could exacerbate flooding and lead to problems downstream where the flow of the river is accelerated. Another constraint in the north-west is the presence of the ancient monument Eccleshall Castle and significant historical landscape features.

Development to the west of Eccleshall village is constrained with access only from narrow country lanes or through already long estate roads and there may also be a local concern about joining the community of Elford Heath to the village. Topographical, highway and access constraints west of Eccleshall could impinge on the viability of any housing development to contribute to the provision of affordable housing. There are no clear geographical or landscape features to the west of the village that could provide a defensible development boundary.

Staffordshire County Council has recently done extensive survey and analysis in relation to historic landscape character to support the Submission Plan. The higher level sensitivity analysis indicates most of land to the east of Eccleshall is of high sensitivity. Land to the south is low and land to the west and north is identified as of medium sensitivity. It should be noted that extensive tracts of land in the Borough are recognised as being of 'high sensitivity' in terms of historic landscape character and this indeed applies to areas that have been designated as strategic development allocations in the Submission Plan. It is therefore by no means an absolute constraint.

In other assessment the historic landscape to the east of Eccleshall is recorded less high than the landscape to the north, south and west. The Historic Environment Character Assessment (HECA) for Eccleshall produced by the County Council and English Heritage for the Borough Council in August 2009 scores the value of the East of Eccleshall landscape zone as 9, with the south 10, the north 16 and Elford Heath to the west 12.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	J Ross Developments (Mr Nick Scott)
Comment ID	PS146
Response Date	25/02/13 14:04
Consultation Point	3.15 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Justified

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

We support the continued designation of Stafford as a Growth Point. However, this should be included within a proper explanation of the post WMRSS environment and how this relates to housing markets and cross-border cooperation between West Midland Councils.

Because growth is distributed between Stafford, Stone and the Key Rural Settlements it is the Borough rather than just Stafford which is the growth point. The acceptance that growth is necessary to underpin facilities is relevant to all these communities.

**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 whole issue of Growth Point, Housing Markets and Cross-border issues in a post WRSS context needs to be more comprehensively explained. It is singularly the most important issue which underpins everything else but is scattered around the Plan in a disjointed fashion.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Creswell Parish Council (Mrs Lisa Horritt)
Comment ID	PS147
Response Date	25/02/13 14:17
Consultation Point	The Plan for Stafford Borough - Publication ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

- . Positively prepared
- . Justified
- . Effective

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

These sites - to the North (and East) of Stafford - **without strategic infrastructure provision, upfront** , cannot be "deliverable" and without such provision cannot be deemed "sustainable" if all that can be foreseen is major congestion and traffic chaos. This is not "positive planning" nor is it "improving the conditions in which people live, work, travel and take leisure ..." either pre or post these developments. **With specific reference to developments proposed for the North (indeed to the East) of Stafford** : - It is the firm view of Creswell Parish Council that much, much more needs to be brought forward, discussed and debated before the Local Plan - supported by any viable Northern Area Master Plan - is in any way "fit for purpose" and can be seen as robustly "deliverable" ... and be able to withstand public examination and scrutiny at any upcoming Examination in Public. **Our full Response is as follows: - CRESWELL PARISH COUNCIL A: Introduction / Overview** The Parish Council notes, within paragraph 16 of the National Planning Policy Framework that neighbourhoods should: -

. *plan positively to support local development, shaping and directing development in their area ...*  
Likewise, we note the first of the 12 core Planning Principles that Planning should be:

- . ***genuinely plan-led***
- . *empowering people to shape their surroundings...*

and that they should: -

- . *provide a practical framework within which decisions on planning applications can be made **with a high degree of predictability and efficiency.***

With specific reference to the Local Plan - the Plan for Stafford Borough - the Parish Council accepts that it exists in an important growth area for Stafford and, in general, is happy to embrace positive and progressive changes - provided that the appropriate measures are in place to ensure that any such change is beneficial in nature and for the general good of both the immediate and wider localities. It is from that standpoint that it makes these representations to this Pre-submission document. **B: Subject matter of "The Plan for Stafford"** That it: "**Sets out a vision , key objectives, the development strategy , strategic development locations and policies for the future development of the Stafford Borough area.**" Consultees are asked to comment on "**the soundness and legal compliance ...**" of a Plan that aims to achieve a balance of sustainable communities across the Borough. In the Ministerial foreword to the National Planning Policy Framework (NPPF), it clearly sets out the underlying principles: -

- . *"The purpose of planning is to help achieve **sustainable development.**"*
- . *"Sustainable means **ensuring that better** lives for ourselves don't mean worse lives for future generations."*
- . *"Sustainable development is about **change for the better ...**"*

And continues, stating that:

- . *"Planning must be a creative exercise in finding ways to **enhance and improve** the places in which we live our lives."*

A theme that is then developed throughout the document and, as early as paragraph 1 states that this framework should be one which: -

- . *"reflects the **needs and priorities** of their communities."*

In paragraph 7, as part of the "economic role", requiring Local Planning to: -

- . *" identify and coordinate developments requirements, **including the provision of infrastructure.***
- . *In ways that should be "**accessible**" and which minimise "**waste and pollution**"*

Paragraph 10:

- . *" **taking local circumstances into account**"*

Whilst crucially, Paragraph 30:

- . *" reducing congestion "*

With, Paragraph 31:

- . *"**viable infrastructure to support sustainable development.**"*

To be compliant with NPPF guidelines / ethos / requirements therefore we must be looking for - and as residents be assured of - a Local Plan that will deliver:

- . *"Sustainable development that is about **positive** growth - making economic, environmental and social **progress** for this and future generations."*

Clearly defined development proposals whose outcome can be seen to be forthcoming in a way that "**enhances and improves the places in which we live our lives.**" **C: The Parish Council's overall standpoint** Creswell Parish Council certainly has concerns and deep reservations that there is insufficient detail - in particular when it comes to provision of transport infrastructure ahead of development - that will provide the required level of certainty / "**predictability**" that the local neighbourhood and residents are entitled to expect. As a consequence, we share the concerns of many in that the published Plan for Stafford is not sufficiently robust and strategic in its proposals to ensure that it is in fact a framework upon which future (and major) developments will or indeed can be "**plan-led**" - rather than "developer-led". Whilst large scale development areas are now identified, the concern is that they are being 'allocated' without sufficient attention being paid - and without sufficient strategic policy definition (and clear "intent") being provided - to ensure that appropriate yet basic, integrated and coordinated infrastructure (principally highways and transport provision) will be forthcoming either upfront or even in the medium to long(er) term. The often 'simplistic assumption' appears to be that the local road network "will cope" and that the use of such existing highway facilities



can simply be "maximised" in order to cope. But with the obvious demand growth that these major developments will create, this is not considered appropriate or acceptable. Within the proposals for the north end of Stafford, not only is there an absence of any significant additional highway provision in the short term, there is an equally noticeable lack of any clear, realistic or defined strategic provision in either the medium or longer term - despite this Local Plan having a minimum 18 year lifespan. In attending LDF / Local Plan forums throughout 2012 (and prior), questions were consistently asked about overall "deliverability", improved local "infrastructure" (principally roads in general ) and about the lack of any visible, positive commitment to the long-awaited, extremely long overdue Eastern Distributor Road; also questions as to "how" these various proposals along the Northern edge of urban Stafford Town were to be "integrated and coordinated". With an absence of any detail / detailed response(s) to these questions, the only consistent response that came increasingly to the fore during 2012 was that these issues would be tackled and the answers would emanate from the "Northern Area Master Plan". That "Area Master Plan" would provide those answers and, having done so, would be the document (and the mechanism for "delivery") that would then underpin the LDF, now the Local Plan, and substantiate it in a sufficiently detailed and robust manner that would enable the combined 'Plans' to be presented to and withstand the rigours of public scrutiny at the Local Plan Examination in Public (to be held in mid 2013). **No such Master Plan yet exists** and so the local communities - our Parish Council included - still do not have any of the answers it needs to allay its fears and genuine concerns; and so struggles to have confidence in, let alone support, this emerging Local Plan. Indeed it seems likely that any such Area Master Plan will not be finalised and available for full public scrutiny and comment until some months after the Examination in Public of the core Local Plan has taken place. Furthermore, a recent public exhibition (January and February 2013), held by the consortium of main Developers for the north of Stafford showed an extended (northwards, east of the A34) area allocated for housing which does not appear at all in the Local Plan and, to the west of the A34, two fields of employment land allocated in the Local Plan which had been completely left out of any integration with the surrounding projects. It is therefore extremely difficult to assess the robustness and deliverability of a plan for the area that includes on page 47, as its opening sentence within the "Infrastructure" section of Policy 2, the statement: -

. *" xiii. Highway capacity improvements, either through or around the perimeter of the site, or along Beaconside, will be required North of Stafford "*.

Is this really the extent of Stafford's Strategic Planning for the next 15-20 years ??? Whilst we acknowledge that "more detailed site-specific " details will eventually follow, it is a matter of great concern that this appears to be scheduled for 2014, at the earliest, and that the local communities are therefore being asked to accept the current proposals "in good - some would say "blind" - faith", trusting that acceptable detail will follow. Not only does this seem to be an approach that in general embraces the concept of "Shutting the stable door after the horse has bolted" but the most worrying aspect is that the most fundamental provision of major, underlying infrastructure - that must, with a high degree of inevitability - fundamentally affect the layout and nature of these large scale developments is also, as yet missing / undefined. How can major areas of future development be approved when no-one yet knows - and no public debate has yet taken place - over the likely (inevitable) provision of significant new highway infrastructure build. All we are told is, in the statement above that: -

. *Highway capacity improvements, either through or around the perimeter of the site, or along Beaconside, will be required North of Stafford "*.

WHAT / WHERE / WHEN / HOW ... Could it be more vague ? A major new highway build either ?around the northern perimeter of these developments sites' or, even more dramatic, ?through the middle of one or more of these sites' can only have a DRAMATIC / FAR-REACHING affect(s) on the as yet purely aspirational, diagrammatic and, at best, illustrative ?proposals' we have seen to date. And yet we are being asked to judge and accept / approve these as "robust, viable and deliverable" strategically proposals".

How can that be possible ??

Finally, for this section, The role - or lack of - of the County Council in providing any clear, let alone forward-thinking / strategic guidance in the specifics of new/enhanced highways provision in this geographical area is a matter of great local concern and is having an unwanted but currently inescapable - and heavily detrimental - affect on the soundness of this Local Plan for Stafford. Without this fundamental information, Creswell Parish Council seriously questions: -

- . How this Plan can be "justified" without the robust evidence of future infrastructure (new road) provision;
- . How this proposed Plan can be deemed "effective" when so many fundamental issues have yet to be addressed;
- . How this Plan can be "consistent" with NPPF Policy when it leaves local communities with such uncertainties;
- . How therefore it can be "legally compliant" if it fails to address and take into account such underlying local circumstances.

**D: The Parish Council's general comments** Turning attention and our response to: SUSTAINABLE DELIVERY It is this Council's strongly held view that "Delivery" has to be considered in two parts: - a: Site identification and inclusion within the overall Plan b: Development delivery upon those selected sites. **1(a) Site identification (and deliverability)** With a few exceptions detailed below, we accept that in general terms the due process has been followed and that the general areas identified throughout the Borough are reasonable and appropriate. In terms of our own immediate locality, we therefore repeat our earlier comment to this effect: - Creswell Parish Council accepts that it exists in an important growth area for Stafford and, in general, is happy to embrace positive and progressive changes - *provided that the appropriate measures are in place to ensure that any such change is beneficial in nature and for the general good of both the immediate and wider localities.* (i): Beyond our own immediate area and with reference to the South of the town, we are disappointed with the apparent lack of progress made in discussions with South Staffordshire District Council - resulting in a complete absence of new development to the south of the town. A concern that this is resulting in an undue imbalance and skewing of development to the north of the town and - in the case of the 2,000 houses proposed alongside Beaconside (beyond Common Road), is likely to create a new community at 'arms length' (without any real connectivity or interaction with) the main urban area of Stafford. (ii): The Parish Council takes note of the recently approved Outline Consent for the County-owned land that will form the Redhill Employment Park and has concerns about the future deliverability of the area of the Local Plan employment land allocation (in private ownership) to the immediate north of this site. Access to this most northerly tract of land seems "uncertain" and its integration into the overall pattern of development seems unclear and appears to be in danger of being overshadowed and 'drowned out' by the major developments that now surround it to the South and to the East and by the major investors now controlling these much larger areas. Indeed, whilst the Parish Council supports the integrated provision of new Employment Land for the north of the town, we now note that this particular area of land has clearly been sidelined and, as stated earlier, was not part of the recent proposals (as exhibited by the Developers' consortium for public consultation) for the north end. The access and roads for the Redhill site have been planned and approved and construction is currently in progress, yet no consideration has been made for the extra land. In fact, County Highways have made it clear that they would not allow any further access from the A34 to the land. Sadly, this land has been isolated by the County Council and other developers and is now undeliverable. (iii): The Parish Council also notes a significant discrepancy on the extended Housing Allocation (on the Akzo Nobel land, to the north of recently approved HP13) which, on the information recently displayed at the Public Consultation exhibition hosted by Pegasus / Maximus / King Sturge (representing the Developers' consortium, as per the above), appears to extend much further north than the area shown on the Local Plan. This appears to be an unexplained 'discrepancy'. (iv): As previously discussed, the availability of these land areas may be significantly (severely?) affected and possibly compromised by any forthcoming new highway build. (v): A very new consideration: - The potential impact on this land's availability / deliverability by the recently announced HS2 preferred route to Manchester. **1(b) Development delivery on these sites** Having identified these sites and "included" them in the local Plan is fine BUT there then come a whole series of questions about the ability to deliver acceptable, sustainable developments on these sites ... and to be able to do so in accord with NPPF guidelines - as outlined above. In a manner than **improves and enhances** the area (surrounding area) as a whole, reflecting the **needs and priorities** of both the new and existing communities. (i): The pre-submission Local Plan deals with matters such as the Northern Access Improvement in such vague and general terms as to render effective appraisal - let alone support - almost impossible. Indeed the "Northern Access Improvement Scheme" is **not even marked** on the "Plan for Stafford Borough" map that accompanies the pre-submission document !! It also deals, where such detail exists, almost exclusively with work already identified (as part of the HP13 Consent) on / around Redhill Island and very little else. The draft Stafford Borough 'Integrated Transport Strategy 2011-2026' actually refers, page 4 "Transport Challenges and Opportunities" to this as "Stafford Northern Access Improvements **in the vicinity of Redhill ...**" We also know of the proposed Urban Boulevard enhancements proposed for the short stretch of the A513

Beaconside Road that abuts the HP13 site and the existing Parkside residential estate - but then NOTHING !! The A513 Beaconside Road then simply reverts to its existing single carriageway status. The Pegasus / Maximus Exhibition then shows a further, remarkably and inexplicably short further extended "enhancement" - NO actual details - of this road but only to the MOD No. 4 site ... not even to Sandon Road B5066 (north) and so not even to the full extent of their own housing development. NOTHING is shown, anywhere, about the remainder of the A513 Beaconside Road from the area adjacent to these developments, for the rest of its entire length out through to the University and the A518 Weston Road. (ii): Even if, for a moment we accept the intent for effective highway provision improvements for the Stafford North area, the only supporting evidence that exists to support the "**Justification**" of this Plan, "**founded on robust evidence**" - as we are asked to comment on - is: The Stafford Borough Infrastructure Strategy - Stage 2 Infrastructure Delivery Plan Final Report July 2012 ... not that this document has ever been put forward for public information / consultation or debate - but it nonetheless exists as the Borough Council's Transport evidence base. Within which document we find the following: - Stafford Northern Access Improvements Paragraph 4.1.2 (through to 4.1.15) "*Modelling of around 2,000 new homes to the north of the town has been carried out together with a Traffic Assessment for SCC owned land for new employment north of Redhill and west of A34, including impacts on M6 Junction 14.*" Before the document goes on to concede that: - "*However the Draft Plan for Stafford Borough considers a different distribution of development with the northern Strategic Development location hosting a higher level of residential development.*" **YES, a 50% HIGHER NUMBER OF HOUSES. Not 2,000 houses but 3,100 houses. And yet, this is the (only) Transport evidence base upon which such "strategic planning" is being based !!** The document continues and acknowledges that: "*Master planning and technical work will inform the development of a more significant infrastructure package to make this level of development acceptable in transport and connectivity terms.*" **And so the only infrastructure study (evidence base) we have is 50% understated.** We are therefore being asked to accept and support a Local Plan for a 5% growth in the population of Stafford, concentrated in one relatively small area to the north of the town, without / ahead of any accurate modelling or transport assessment for the impact this will have on the area and/or what new and additional infrastructure will be required. This is a strategic plan !!

- . A Strategic Plan that empowers local communities to make informed decisions that will affect their everyday lives now and in the immediate and longer term future.
- . A Strategic Plan that we are supposed to assess and endorse as being "sustainable" and one that will (NNPF Ministerial Foreword) bring "economic and social progress for this and future generations"?

As the Local Plan document itself says, paragraph 1.2: -

- . "*... new development that meets local needs ... whilst **protecting the existing high quality of life in the Borough.***"

Surrounding an already seriously congested road network with 3,100 houses without any form indication of what measures will be put in place / new highway infrastructure will be provide to make that situation bearable for those who already live in the area and will come to live in the area in the future !!

Sustainable development that **meets the needs of the present without compromising the needs (and quality of life) of future generations.** Meeting the **needs and priorities** of both the new and existing communities On what possible basis can this (part of this) Plan be "justified" or deemed either "robust" or "deliverable" ? (iii): The Eastern Access Improvement: - In attending LDF / Local Plan forums throughout 2012 (and prior), questions were consistently asked - not only by Creswell Council and residents but by Stafford residents from all quarters - about overall "deliverability", improved local "infrastructure" (principally roads in general ) and about the lack of any visible, positive commitment to the long-awaited, extremely long overdue **Eastern Distributor Road**. There has also been consistent criticism about the suggestion that the short stretch of road from the A518, past proposed new housing developments to St Thomas' Lane is somehow to be effective as the "Eastern Access Improvement Scheme - serving as it would do, simply to facilitate traffic movements in/out of this new residential development ... with even further criticism that, having emerged onto St Thomas' Lane traffic options as to where to go from there are severely limited. The three (four) narrow bridges to Baswich Lane already being acknowledged as a bottleneck ... and Baswich Lane itself described to us as "self-regulating" - being transport-speak for "unable to cope with any more traffic."

- . Put simply - this new, short stretch of road would be a road "to nowhere".

It would certainly do little if anything to improve Eastern Access to Stafford town. It was therefore with complete incredulity that we read this latest document only to discover that this quirky road proposal had now been re-labelled as "Phase 1 - Eastern Distributor Road." Even if we were, for one short

moment, to accept it on face value, it immediately begs the questions: 1: Where / when are Phases 2 / 3 / 4 ... leading to EDR completion

. No mention anywhere (over the next 18 years !!)

2: What is the route of the EDR of which this is now a part??

. No mention anywhere in the entire written document.

Only if an individual who knows what they are searching for, drills down about 4 layers into the on-line "Plan for Stafford Borough" map - which is not even an immediately obvious attachment to the on-line Consultation Document - can one suddenly find a dotted blue-line "route" for the future EDR. Our own Parish Council only found out about this "EDR Route" when for other reasons, we requested and obtained a printed copy of the above Plan for the Borough. Since which time, no-one resident or Councillor that we have spoken to even knew there was an EDR Route !! Having been consistently told at all LDF and other Transport Forums that "there are no current plans for building the EDR" - followed by a raft of excuses masquerading as reasons against its construction - and that there would be no Plans for including an EDR in any Local Plan for the foreseeable future, it is frankly unbelievable to see this one-off, short, road to nowhere, magically relabelled as part of an actual EDR route. There is no evidential base, no evidential documentation (save this one map) to give any credence to this "route" or to any concrete plans to ever build the EDR.

. It is not mentioned anywhere in the Stafford Borough Infrastructure Strategy - Stage 2 - Infrastructure Delivery Plan, Final Report : July 2012

. It is not mentioned in the (SCC) Draft Stafford Borough Integrated Transport Study 2100- 2026

. It is not mentioned in the (SCC) District Integrated Transport Strategy - Report on the Outcome of the Consultation Process 2011 / 2012

. It is not mentioned anywhere in (SCC) Appendix 2.2 : Community Infrastructure Fund Bid for a Package of Sustainable Transport Measures for Stafford

And, for what would after all be a major arterial route / by-pass / highway enhancement for Stafford Town - developed over a series of phases - is not mentioned (other than this short stretch to St Thomas' Lane aka, until this most recent document, the Eastern Access Improvement Scheme) **anywhere** in the entire pre-submission Local Plan for Stafford document other than nine near-identical and 'passing references' to this single, short stretch of road.

. **No other mention of the rest of the route, let alone any further phasing.**

And so this short stretch of residential estate access roadway is, as Phase 1, the only stretch of this EDR contemplated within the next 18 years. Some phasing that !!! Finally on this point, given that there is no enhancement shown for the majority of the A513 Beaconside from west of Sandon Road (north) along the remaining 2/3rds of this busy and congested road - there is no 'joined up thinking' that would see the existing Beaconside Road upgraded to play its part in any (future) EDR / By-pass route around the Northwest of Stafford town. That Stafford's residents are expected to give any credence to the highway provision to facilitate any of the proposed developments to the North and to the West of Stafford frankly beggars believe.

. It cannot be "justified" - it is not founded on any definable, let alone robust, evidence.

. It cannot be "effective" when built on such inadequate premise(s).

. It cannot be consistent with NNPF requirements when there are such huge holes in its "strategic provision".

. How then can it be legally compliant, when such obvious information, evidence supporting documentation and public consultation over such measures is so clearly absent?

**E: Conclusion** These sites - to the North (and East) of Stafford - without strategic infrastructure provision, upfront, cannot be "deliverable" and without such provision cannot be deemed "sustainable" if all that can be foreseen is major congestion and traffic chaos. This is not "positive planning" nor is it "improving the conditions in which people live, work, travel and take leisure ..." either pre or post these developments. **Creswell Parish Council cannot therefore support the Local Plan proposals for its area on such a basis.**

**F: Additional detailed comments** We attach an appendix to this submission within which we have responded in more detail to specific and individual section - paragraphs and Policies - of the pre-submission Local Plan document. Notes: 1: Although we will add these into the online system at the relevant points, for the convenience of the reader, we also leave them attached as a single Appendix to this main body of our response - which we will load as a single attachment file. 2: In addition, since we believe that the failure to adequately identify, provide delivery actions and policies for the (major) new highway infrastructure provision required by the proposed developments at the North (and West) of Stafford is such as to potentially affect the whole of Stafford town, we intend

to load this entire document at the front of the on-line Consultation, but will also add the main body of this Response (as per the pages above) to Section 7 Stafford, **Policy Stafford 2 - North of Stafford** ; where it is of specific, detailed relevance. **G: Next steps** The Parish Council wishes to be kept fully informed of progress and, specifically, to be informed as/when the Plan for Stafford Borough DPD has been submitted to the Secretary of State for Independent Examination - an examination at which the Parish Council will almost certainly seek to be represented. **APPENDIX** Reference specific sections of the pre-submission Plan document: **Paragraph 1.1** With specific reference to proposed developments alongside Beaconside: whilst the Plan "directs where new development will take place" and begins to "describe what changes will occur" it **fails** , in the absence of highway infrastructure detail to adequately identify "how places will be shaped in the future." Simply saying that more site-specific detail will follow is not sufficient to render this strategic document "effective" or underpin its "deliverability." The provision of such area-wide and fundamental infrastructure supersedes individual site-specific detail - and only when this higher level detail is known can the "effective" nature of these proposals be judged. **Paragraph 1.2 A** "vision" without the underlying infrastructure that will, by its very nature, define the area it supports cannot claim to have effective "place-shaping objectives". Likewise this omission makes it extremely difficult to assess the "effectiveness" (delivery) or "justification" (without this base information and the clear evidence to support the chosen option(s)) and so confounds attempts to assess whether these unspecified decisions would be "consistent" with NNPf requirements: -

. " to ensure development meets local needs ... whilst protecting and enhancing the existing high quality of life in the Borough."

Since failure to properly meet these "local needs" (now and post developments) may very well diminish, rather than protect and enhance, the existing quality of life ... increased traffic congestion, queuing / standing traffic with all its associated exhaust fume pollution, etc. And yet, **Paragraph 1.13** states that this document " contains the development strategy, policies on how to deliver the Local Plan's vision ... which, in this vital regard, we consider that **it does not** . **Paragraph 2.25** This proposed local Plan makes considerable incursions into the "unspoilt countryside" to the north of the town - an incursion that could be made even worse by the potential of a new highway infrastructure, as per Policy2, sub-section xiii " around the perimeter i.e. to the north of the site ..." There may, in the event be no objection to such a new highway - but the Plan is totally non-specific and therefore, as Consultees and local residents, we simply do not know. **Paragraph 3.3** "sustainable development ... balance ... future generations ..." cannot be permitted to include a situation whereby existing roads are even more congested than they are now, rendering quick, effective and efficient access impossible or at the very least intolerable. To suggest that the existing, congested roads can cope with all demands imposed upon it for the next 18 years, whilst contemplating creating a 5% growth in the residential population of the Borough in this one condensed location cannot be "justified" or sustained as an "effective" strategy. **Paragraph 3.5**

. ... including the provision of **infrastructure**

. ... **accessible** local services ... for which one does not have to endure excessive, traffic congested journeys

. **Environment** not polluted by bumper-to-bumper traffic congestion at all peak times and whenever there are problems on any of the surrounding roads - the M6 motorway in particular.

**Paragraph 3.12** In the absence of a perceived lack of agreement and progress in talks between Stafford Borough and South Staffordshire District Council what realistic hope is there for the EDR (Eastern Distributor Road) ever reaching Junction 13 of the M6 ? **Paragraph 3.13 Neighbourhood Planning** To note that Creswell Parish Council is effectively prevented from being able to prepare and present a Neighbourhood Plan by virtue of majority of the Parish being within a designated 'major strategic development area'. **Paragraph 3.15 / 3.16 /3.17** o Provision for local communities o The need for new infrastructure improvements o Delivery of key infrastructure ... and high on everyone's agenda is "more roads" - including an Eastern Distributor Road to provide a through-route and bypass for Stafford town centre - and yet this 18 year strategic Plans throws no effective light (or hope) on these matters. Local communities here at the north end of Stafford suffer frequent holdups and road blockages the moment anything untoward occurs anywhere on the M6 from Junction 12 in the south to Junction 16 in the north. The vast majority of this traffic is forced along the A34, through the centre of town - for which the only practical, available route is along Queensway and so the entire town centre 'locks up' at a huge cost to local businesses. Despite the imminent construction of two new supermarkets (Morrisons and the new Marks & Spencer complex) there is no relief offered for such circumstances. NOT an "effective" way forward. **Paragraph 3.20 Outcome 2:** Can this Plan really put forward Stafford as an "aspirational place to live" if the daily journey to work is so fraught with difficulty

... when it can , in the present day , take anything in excess of 20 minutes for the 2-mile journey across town - be that by private car or by public transport. And when employees find it quicker to commute 15 miles into Stafford from other conurbations and local villages rather than face what is frequently a 50-minute commute from one side of Stafford to their workplace on the other side of town. **Congestion is the big problem Stafford has to get to grips with ... and it can / will only get worse with such major new developments in the pipeline. Paragraph 5.1 Spatial vision (f) (f)** ... convenient sustainable connections from / to new developments **(i)** new ... developments supported by ... new infrastructure provision In terms of enhanced and improved highway capacity - and the daily commute will always exist even if only "from one side of town to the other" - we simply do not see any strategic solutions outlined in this Local Plan ... and 18 years is a long time to (a) get things wrong and then (b) struggle to put things right retrospectively. **SPATIAL POLICY 1** says the right words in seeking to "*improve the economical, social and environmental conditions in the area*" but, as the local Parish Council, we struggle to see how / where / when these fine words manifest themselves into reality and into practical, upfront provision. If this were truly a "plan-led" Strategic Document then we might have (slightly) more confidence but, having initially identified areas and strategic development sites, too much is then left to become "developer led" ... the most obvious example of which is handing the preparation of the Area Master Plans over to the development consortia to see what they come up with / what they will offer ... which in any commercial, finance-driven world, will (we fear) be as little as possible - the minimum that can be got away with. At the risk of repeating ourselves, we see no strategic "delivery plan" for our area. **Paragraph 6.23** Talks about "... *growth .. together with new transport and social infrastructure* ... such that Stafford continues "to be a vibrant and active community" but we struggle to see those fine words translated into action points within the detail of the proposals put forward in The Plan to date. Consequently our fear is that our local community(ies) will be strangled by inadequate and increasingly congested roads and therefore that these otherwise exciting new developments will become a curse rather than a blessing. We wish to see proactive, advance planning and not have to face the long-winded, uphill struggle for retrospective fixing of problems generated by such large scale developments. We would wish to support the principles of: **SPATIAL PRINCIPLE 7 (SP7) - Supporting the location of new development: - (e)** that these are "*the most sustainable in terms of impact on existing infrastructure, or demonstrate that infrastructure can be provided to address development issues*" in ways that will: **(k)** "*ensure adequate vehicular, pedestrian and cycle access as well as cycle and short-stay parking facilities on the site; and (l)* that" *will not adversely affect the residential amenity of the locality.*" But we then struggle to find anything else, anywhere else in the document to provide concrete evidence / assurance that these things will happen. We would cite, as a current example, the new Redhill Employment site which included in its Application Justification that a Park & Ride facility would ("could") be incorporated within the site but find nothing since to afford us any confidence that such a facility will ever actually come to fruition - an "aspiration" that is more than likely to 'wither on the vine'. Likewise any (future) provision for overnight HGV parking ... and yet we already suffer the congestion, environmental damage and pollution of excessive and unwarranted overnight HGV parking on Prime Point 14 / ProLogis Park that is damaging pavements, kerb stones, grassed areas and generally blighting the area on a daily basis. Something that, as it stands, the Redhill Employment Park will only exacerbate. WHY? Because there is no actual, concrete, Borough-led (or County-led) Strategy or Policy to do anything about it ... instead just classic developer-led plans that simply ignore local needs and duck local problems, even when they themselves are the inherent cause of those problems. Once bitten, twice shy ... and Creswell Parish Council and local residents have been bitten more than once !! Which is why, in an 18-year Local Plan Strategy document, we are looking for such assurances ... but failing to find them. **Policy Stafford 1 - Stafford Town** (page 37) **=1=** The main body of our Response refers to this section, wherein (firstly) we make specific reference to the Northern Access Improvement Scheme (as per 'Housing' sub. Paragraph (a)) and what is now referred to as Phase 1 of the Eastern Distributor Road (aka the Eastern Access Improvement Scheme - Housing, sub. Paragraph (c)). Further noting - with regard to Infrastructure (road) provision i.e. the limited Northern Access Improvements (aka enhancements to Redhill Island) and the absence of any enhancements at all to the western 2/3rds of Beaconside Road (A513) - that we do not consider these provisions come anywhere close to providing an integrated solution that, in any way, forms a viable EDR ... Phase 1 or otherwise.

**=2= Paragraph 7.18** For information: We note that reference to Chapter 14 "Infrastructure for Stafford Town" is actually a reference to Chapter 13. **=3= Policy Stafford 1 - Stafford Town** (page 37) **further comment:** The main body of our Response again refers to this section, wherein (secondly) we make specific reference to the proposed build of 3,100 houses and the, as yet non-existent, Master Plan for this Strategic Development Location: -

. making it difficult to assess the "effectiveness" and "robustness" of a development outline. An outline that is lacking the basic, fundamental and underlying highway infrastructure that must, of necessity, greatly influence the overall shape and layout of the development of the area. In particular we highlight the vagueness of subparagraph xiii of sub-section headed 'Infrastructure' which intimates that a new road "might go somewhere" !!! We find that this document adds nothing to the one-off, almost throw-away statement regarding "bus priority" proposals (??) - Proposals as yet unseen by the public - along the A34 Stone Road into Stafford. This later "proposal" definitely **fails** any "robustness test" given that no evidence whatsoever is (publicly at least) forthcoming to endorse this suggestion.

**Page 48, first paragraph:** " *Highway capacity improvements along the A513 ...*" Again, we have commented in detail on this point in the main body of this response - but WHAT enhancements, and for HOW MUCH of the A513 ? All available information to date is extremely vague about the short stretch of the A513 Beaconside from Common Road / Marston Lane to the MOD No. 4 Site - which may / may not be enhanced to the same standard as that proposed opposite Parkside (as part of the recently approved 400 house development there). There appears to be NO FURTHER ENHANCEMENTS along the remaining 2/3rds of the A513 Beaconside Road (all the way to the A518 Weston Road). **Page 60, Stafford east Concept Diagram:** *Proposed new road* As we have commented, at length, within the main body of this response, this clearly is a short - an extremely short - stretch of road " **going nowhere**" !! Opening onto an extremely narrow "country lane" that in turn leads to three very narrow, difficult to traverse, road bridges, plus a railway bridge, leading to a residential estate road (Baswich Lane) that already has traffic in excess of its capacity to cope. **Policy E4 - Economy - Raleigh Hall & Ladfordfields - Recognised Industrial Estates** Described in **paragraph 9.16** : "*Both locations have good transport links to Stafford ...*" Unfortunately the majority of this traffic bound for Stafford and the M6 is funnelled along the A5103 and through Creswell Gove - a narrow, single carriageway, residential road - which is already carrying in excess of 10,000 vehicle movements per 24 hours ... one of the busiest roads into Stafford. This is already having a detrimental environmental impact and seriously affecting the quality of life for local residents along this 'ribbon housing development' ... and which is (currently) the residential heart of Creswell Parish. We cannot see that any consideration has been given to the impact of (the growth of) these RIEs on the surrounding rural communities and the small villages through which their traffic must inevitably pass. **Paragraph 10.5** Whilst this Parish Council, along with many others, would wholly endorse the sentiments expressed herein, we can find little of proven, robust, substance to endorse or underwrite these "fine words". The local transportation network is not just "important" but **vital** to the day to day access requirements of the people of Stafford town and of Stafford Borough as a whole. It is also extremely congested at the present time and will struggle - and ultimately (indeed very quickly) fail - to cope with the transportation demands of the massive developments proposed for the north of the town. Prime Point 14 / ProLogis Park - and possibly a significant section of the new Redhill Employment Park - are occupied by 24x7 Logistics Companies for whom swift, reliable and timely access to/from their depots is vital. Not all traffic heads straight for the M6 - much heads north along the A34 or East along the A513 heading for the A50 (leading to the M1) and beyond. The bland statement that:

. *Highway construction and access improvement will be necessary to cope with the proposed growth increases ...*"

whilst true, needs to be backed by strong, visible, defined strategic plans - plans that must be put in place before development begins. Only then can those plans be regarded as "justified", "effective" and "robust" ... otherwise it is just guess work, presumption and, even worse **assumption** ... and we all know what "assumption" does - makes an ASS of U and ME. WHERE IS THE STRATEGY that can enable "effective" Development Planning, on the scale proposed to take place, deliver "effectively" outcomes and be to the benefit of, and without enormous harm to, the existing local communities and infrastructure ??? Paragraphs 10.6 through 10.9 endorse the need but lack the substance of any real, strategic or **actual** proposals or provision. **These matters have to be determined up front - afterwards is simply too late. Otherwise the damage will have been done, the buildings and houses built ... and then, oh dear, we find have a problem !!!** **Policy 11 - Infrastructure Development Policy** This is on the back of the **Infrastructure Deliver Plan** ... which is based on a presumption of 2,000 houses to the north of Stafford **and NOT** 3,100 new houses now being proposed. As an Evidence Base it is **50% understated and therefore WHOLLY INACCURATE, inappropriate and FAILS to provide the robust evidence base this Local Plan needs.** Therefore when, in **paragraph 13.3** , the Plan states that this IDP has been drawn up to:

. " determine the infrastructure requirements to support the delivery of the ?Plan for Stafford Borough.'

it clearly **FAILS. The evidence base is fatally flawed.** It must therefore draw into question the assertion, in **paragraph 13.21** , that " *the viability of development proposed in this Plan, particularly of the Strategic Development Locations* - and specifically this to the north of Stafford town - *has been assessed throughout the preparation of the Plan.*" The Plan has moved on significantly, but the IDP has not caught up. It is now hopelessly, dangerously, out of date as far as the north end of Stafford is concerned - and the impact of developments of the scale now envisaged here may also have significant impact further afield - throughout the whole urban area and, indeed, to the rural areas beyond. We simply do not have a plan - for the north Stafford - that is based upon "robust evidence" and so clearly **FAILS** the "justification" test in this important regard. Its "deliverability" is therefore in question - and how can these out-dated matters be monitored when there is no firm evidence base upon which to assess its proposals, let alone its outcomes - and therefore the Plan as it currently exists cannot be assessed as "Effective". The " *viability* " is simply not there to be judged. **Appendix conclusion**. It is therefore the firm view of Creswell Parish Council therefore that much, much more needs to be brought forward, discussed and debated before the Local Plan - supported by any viable Northern Area Master Plan - is in any way "fit for purpose" and can be seen as robustly "deliverable" ... and be able to withstand public examination and scrutiny at any upcoming Examination in Public.

**Next steps**. The Parish Council wishes to be kept fully informed of progress and, specifically, to be informed as/when the Plan for Stafford Borough DPD has been submitted to the Secretary of State for Independent Examination - an examination at which the Parish Council will almost certainly seek to be represented.

**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.**

That there must be an agreed - post Public Consultation, properly debated - Northern Area Master Plan.

In the absence of such a Master Plan, underwritten by defined agreement with the Development Consortia concerned, we question the deliverability and therefore the viability of these sites and how they can effectively be brought forward ... and with any degree of local support and consent.

This is supposedly a "Plan-led" Startegy and yet there is NO DELIVERY Plan. We are supposed to be content with this being made up "after the event" - surely an unacceptable way to 'plan' major infrastructure, place-shaping highway (and other) provisions?

*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

**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**

To contribute to the debate on the issues raised.





Date: 21 February 2013

Andy Johnson

Our Ref: AJ/JF

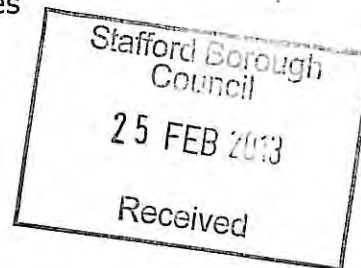
696457

Your Ref:

696403

a.johnson@sstaffs.gov.uk

Head of Planning & Regeneration Services  
Stafford Borough Council  
Civic Centre  
Riverside  
STAFFORD  
ST16 3AQ



Dear Mr Manders

**THE PLAN FOR STAFFORD BOROUGH – PUBLICATION PRE-SUBMISSION DOCUMENT**

South Staffordshire Council welcomes the opportunity to be able to comment on the Plan for Stafford Borough – Publication Pre-Submission Documents Consultation. The Council's response is a decision of the Cabinet Member for Strategic Services, Cllr Bob McCardle, and this decision will be open for scrutiny by Members outside the Cabinet. Please accept this letter as an interim response of South Staffordshire Council, pending the expiry of the Council's formal Constitutional processes. I shall write to you again once these have been completed.

The Council's responses to the proposals in this Consultation are:

*Development of land south of Stafford*

South Staffordshire Council supports the Publication Document which states in para 3.12 that, 'The Plan for Stafford Borough is based on the clear conclusion that development [to the land south of Stafford in South Staffordshire] is both less practical and less sustainable than other locations around Stafford town and is therefore not proposed to identify significant development south of Stafford in the new Plan'. More development to the south of Stafford, would harm the setting of villages and could set the precedence of coalescence with Dunston, Acton Trussell and other small villages in the north of our District. The villages of Penkrige and Dunston need to be protected, where any development should be of a modest scale and delivered for their own local needs. It is proposed therefore, to respond that this part of *The Plan for Stafford Borough* is sound and justified.



## *Regional Logistics Site*

Paragraph 3.12 of *The Plan for Stafford Borough* states, 'the West Midlands Regional Spatial Strategy (RSS) evidence base highlighted a requirement to provide a new 50 hectares Regional Logistic Site with access to multi-modal transport facilities to serve the Black Country, to be located in southern Staffordshire'. It then continues to say that, 'a study to assess the need and identify potential areas to accommodate a new Regional Logistics Site is subject to on-going work and cross-border discussions with relevant planning authorities. If a preferred location is identified with implications for Stafford Borough, this may be considered through a partial review of the new Local Plan'. The reference to RLS is extremely similar to the information contained in our submitted Core Strategy. However, during our Core Strategy Examination, the Inspector considered South Staffordshire's stance and felt that a lack of commitment to a study in the Core Strategy without the evidence to support such a view, was a matter of soundness, in that our Local Plan was not positively prepared nor justified. He stated:

65. *The RS Phase Two Revision includes a policy relating to the provision of a Regional Logistics Site (RLS) to serve the needs of the Black Country. Local Authority areas within southern Staffordshire are identified within an area of search for the RLS. As submitted, the CS acknowledges the need for a comprehensive study to explore the alternatives, but does little to facilitate this or otherwise positively address the issue. The positive preparation of the CS is at issue here.*
66. *However, the Council has put forward a modification (MM13) on this point. New wording is proposed which recognises that Wolverhampton City Council has agreed to lead on joint working with the other Councils involved. It also commits the Council to co-operating in this study and endeavouring to ensure that it is completed by the end of 2012. This is necessary for soundness and the proposed text goes as far as could reasonably be expected, given that this matter is not wholly in the Council's control.*

South Staffordshire Council is extremely concerned that Stafford Borough Council has no evidence to support not agreeing to be an equal and willing participant in any RLS studies and agreeing to do so formally in their Core Strategy. Stafford Borough Council is in a similar position to South Staffordshire with a location identified in a list of 'possibilities to be explored further for the provision of RLS' in the RSS evidence base (RSS2 EiP Panel Report Recommendation R 5.15). It is South Staffordshire's view therefore, that Stafford Borough Council's Local Plan should be consistent with our Core Strategy. It is proposed therefore, to object to soundness of *The Plan for Stafford Borough* on the grounds that it is not 'positively prepared' or 'justified'.

These concerns have been conveyed to officers at Stafford Borough and a meeting has taken place with their Director of Planning. Following this meeting, revised wording has been proposed and our officers have responded. The revised wording now proposed is attached at Appendix 1.

Subject to confirmation that the revised wording will be integrated into the emerging Local Plan, it is considered that Stafford Borough have gone as far as can reasonably be expected in order to address the issue of Regional Logistics Sites (RLS) provision.

*Cannock Chase SAC and potential impacts resulting from The Plan for Stafford Borough*

South Staffordshire Council supports the provision of Policy N6 within *The Plan for Stafford Borough*, which provides detailed policy on development proposals that may affect the Cannock Chase SAC. The criteria is considered appropriate. It is based on appropriate evidence and it supports the provisions set out in the Cannock Chase Visitor Impact Management Strategy in terms of appropriate mitigation measures. It is proposed therefore, to respond that this part of *The Plan for Stafford Borough* is sound and justified.

*Duty to Co-operate*

The duty to co-operate is a requirement of the Localism Act 2011. The two Authorities have a good working relationship, which includes the period prior to the enactment of the Act. South Staffordshire Council welcomes and supports further co-operating working with Stafford Borough on the above issues or any other issues that may arise in the future.

I trust that due consideration will be given to the Council's responses set out above.

Yours sincerely

Andy Johnson  
**Director (Planning & Strategic Services)**

REVISED REGIONAL LOGISTICS SITES (RLS) SECTION

Regional Logistics Sites

The West Midlands Regional Spatial Strategy (WMRSS) Phase 2 Revision contained a policy relating to the provision of Regional Logistics Sites (RLS) to serve the needs of the Black Country located in southern Staffordshire and to serve the North Staffordshire conurbation. The Panel Report into the WMRSS Phase 2 Revision supported the need for Regional Logistics Sites as detailed in Policy PA9 – Regional Logistics Sites below, as amended by the Panel Report published in September 2009:

- "A. Within the portfolio of employment sites, provision should be made for Regional Logistics Sites (RLS) the purpose of which will be to provide opportunities for the concentrated development of warehousing and distribution uses.
- B. RLS with existing or potential for dedicated rail access to freight routes with at least W8 loading gauge and close proximity to a junction that could provide access to the Strategic Road Network or other principal roads should be identified in Core Strategy DPDs. The Regional Planning Body should be consulted on such proposals. Sites should also:
  - i) Ideally be in the order of 50 hectares or more but smaller inter-modal sites may be appropriate for consideration as RLS if they can be closely associated with substantial warehousing on adjacent or closely related land
  - ii) possess good quality public transport links, or be capable of having such links provided
  - iii) be served or proposed to be served by multi-modal transport facilities and broadband IT infrastructure
  - iv) have easy access to an appropriate labour supply and education and training opportunities
  - v) aim to minimise environmental impact
  - vi) have a suitable configuration which allows large-scale high-bay warehousing, intermodal terminal facilities, appropriate railway wagon reception facilities and secure parking facilities for all goods vehicles (see also policy T10) and
  - vii) be located away from incompatible neighbours allowing 24-hour operations and no restrictions on vehicle movements.
- C. Based on a study of the future demand for logistics within the Region it is estimated that at least 200-250 hectares of land could be required on RLS-type locations to serve the West Midlands in the period up to 2021.
- D. The Region should have a choice of RLS available at any point in time and consideration and priority should be given to bringing forward additional land taking account of the following in priority order:

1. Utilising the full potential for the expansion of the existing RLS at Hams Hall, Birch Coppice and Hortonwood;
2. Securing provision of new rail-served facilities to serve (a) the needs of the Black Country located in southern Staffordshire and (b) to serve the North Staffordshire conurbation.

Discussions between the relevant local authorities and key partners including AWM in the areas identified above should identify how RLS provision will be met and subject to agreement by the RPB the sites should then be taken forward through the relevant Core Strategy.

Annual monitoring will be important to ensure that there is adequate provision for this sector throughout the plan period.”

Furthermore WMRSS Phase 2 Revision Inspector’s Report amended paragraph 7.46 stated:

“Major concentrations of warehousing and distribution will be discouraged both within urban areas and immediately adjacent to motorway junctions, where a high level of heavy goods traffic would further exacerbate congestion. Possibilities to be explored further for provision of RLS include Brinsford, Four Ashes, Cannock, Fradley and Meaford.”

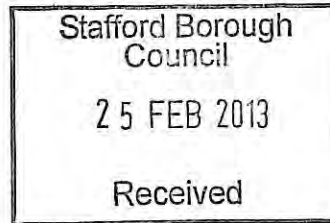
Subsequently Inspector’s Reports into the Examinations of the Black Country and South Staffordshire adopted Core Strategies has lead to joint working between the Black Country and southern Staffordshire authorities to update the evidence base concerning the identified need for large scale logistics activity and how needs might best be met, led by Wolverhampton City Council. A Stage 1 Report for the Black Country and southern Staffordshire Regional Logistics Site Study is anticipated in Spring 2013 for implications to be considered.

To date no development sites have been put forward for a Regional Logistics Site in Stafford Borough. As part of the WMRSS Phase 2 Revision in paragraph 7.46 reference was made to Meaford, north of Stone as being one of a number of ‘possibilities to be explored’. However it should be noted that Meaford former power station site has been granted planning permission for 34 hectares of new employment provision, subject to a Section 106 agreement to deliver transport access infrastructure. In terms of meeting the policy criteria set out in the WMRSS, in particular the RLS being 50 hectares or more and having existing or potential for dedicated access to the regional rail and close proximity to the Strategic Road Network the only area of search for such a site would be south of Stafford near Junction 13 in Stafford Borough / South Staffordshire District. Nevertheless Stafford Borough Council will continue to co-operate with partners and relevant parties to ensure that further studies are completed in order that the issue of providing RLS in the West Midlands Region is addressed.

KT/1732A/07(15Feb13)Stafford

Forward Planning Section  
Stafford Borough Council  
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Riverside  
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22 February 2013

Dear Sir or Madam

**STAFFORD BOROUGH COUNCIL: THE PLAN FOR STAFFORD BOROUGH PRE-SUBMISSION PUBLICATION  
COMMENTS ON BEHALF OF WM MORRISON SUPERMARKETS PLC**

With reference to the above and on behalf of our client, Wm Morrison Supermarkets Plc ('Morrison's'), we write to thank you for providing us with an opportunity to comment on The Plan for Stafford Borough.

Morrison's is a major food and grocery retailer, which currently operates a store at Mill Street, Stone.

We previously submitted comments on the emerging Local Plan for Stafford at the Draft Publication Consultation stage in October 2011. At that time we requested that consideration be given to the expansion of Stone Town Centre's Primary Shopping Area (PSA) boundary. These comments were submitted on the basis that the existing Morrison's store at Mill Street lies directly to the north of the PSA, and that Annex B of PPS4 stated that a Primary Shopping Area is a '*defined area where retail development is concentrated*'.

Our letter of representation highlighted the fact that the store is a key anchor of the town centre, and generates a significant number of linked journeys between the store and the PSA, thus helping to ensure the vitality and viability of Stone is maintained. For these reasons, we suggested that the PSA boundary of Stone should be extended to include our client's store.

Unlike the Draft Publication Local Plan, we note that the Pre-submission document does not contain a map which shows Stone's PSA and town centre boundaries. However, we note that the Council's online mapping service highlights the proposed boundaries, and our comments are therefore based on this. An extract of the map is enclosed for ease of reference.

We note that in respect of the Morrison's store, the proposed town centre and PSA boundaries remain unchanged from the previous consultation stage. In this regard, we would like to reiterate our earlier comments, and we provide further justification as to why we consider that our client's store should form part of Stone Town Centre's PSA.

In December 2012, our client instructed NEMS Market Research to undertake an Exit Survey at their store in Stone, in order to determine the level of linked trips that take place between the store and the town centre.

**Managing Director:** Peter R.B. Wood Dip TP, MRTPI  
**Directors:** Chris Creighton BA (Hons), MTP, MRTPI  
Mark Eagland BA (Hons), MTP, MRTPI  
**Senior Associates:** Cassie Fountain BA (Hons), Dip TP, MRTPI  
Ed Kernsley BA (Hons), Dip TP, MRTPI  
Steve Buckley BA (Hons), BPL, MRTPI  
Anthony Ferguson MA (Hons), MRTPI  
**Associates:** Sarah Worthington MPhil (EnvP), MAUED, MRTPI  
Gareth Glennon BA (Hons), MA, MRTPI  
Cara Ware MTCF (Hons), MRTPI  
**Consultant:** Robert Smith Dip TP, MRTPI

The aim of the survey was to assess the occurrence, frequency and type of linked trips undertaken. A seven day survey was carried out on 11, 12, 14, 15, 17 and 19 December 2012, and on 03 January 2013. Between 25 and 53 interviews were carried out each day at various times, and a total of 304 customers were interviewed at the store over the survey period. A copy of the survey questionnaire is enclosed.

On the whole, the survey found that 41.4% of all respondents had or were about to combine their trip to the Morrisons store with another activity in the town centre on the day they were interviewed. These respondents intended to visit the town centre to undertake a number of activities, with the most popular responses being to visit the bank/Post Office/building society or cash point (52.1%), and shopping for other non-food items (43.3%).

When asked how often they combine a trip to Morrisons with any other activity in the town centre, 58.9% of all respondents stated that they either always or frequently make a linked trip.

The survey shows that 96.5% of all respondents who travelled to the Morrisons store by car chose to park on the store car park. It is pertinent to note that on the day they were interviewed, 61.9% of respondents who combined their trip to Morrisons with another activity in the town centre, did so prior to visiting the Morrisons store, and 69.2% of people who had or were about to make a linked trip that day, or who always or frequently made a linked trip, did so on foot.

In this regard, it appears that many customers who drive to the store park their cars on the store car park, and then make a journey, on foot, to the town centre before returning to the Morrisons store to fulfil their food shopping needs. It is clear, therefore, that genuine linked trips take place between the Morrisons store and the PSA of Stone town centre.

The survey results also show that 84.9% of respondents stated that their main reason for visiting Stone on the day they were interviewed was to visit the Morrisons store. This figure is likely to be high given that interviews took place inside the Morrisons store, however it does indicate that Morrisons is a key generator of trips to Stone, and helps to maintain the vitality and viability of the town centre.

In terms of planning policy, whilst PPS4 has been superseded by the National Planning Policy Framework (NPPF), we note that the advice contained within PPS4 Practice Guidance on Need, Impact and the Sequential Approach is still applicable. It is pertinent to note that paragraph 6.4 of Practice Guidance states that:

*"The presence of key anchor stores and other main town centre uses (e.g. cinemas) may also help to identify the extent of the PSA"*

It is clear that our client's store is a key anchor of Stone Town Centre, and this is highlighted by the results of the Exit Survey.

In light of this and all of the above, we maintain that our client's store should form part of the Primary Shopping Area of Stone town centre, and again request that consideration is given to amending its boundary to include the Morrisons store.

Furthermore, we note that whilst the store and the car parking area to the west of the store building is included within the town centre boundary, the car parking area to the south of the building is excluded. Given that the entire site is under the ownership of Morrisons, and as indicated above, provides a significant level of car parking for town centre shoppers, we request that the town centre boundary is amended to include this area of car parking, in addition to the rest of the Morrisons site.

We trust that this is helpful and would be grateful if you could ensure that Peacock and Smith are kept informed of the progress of the emerging Local Plan. If you have any queries, please contact Kate Tinsley at the address overleaf.

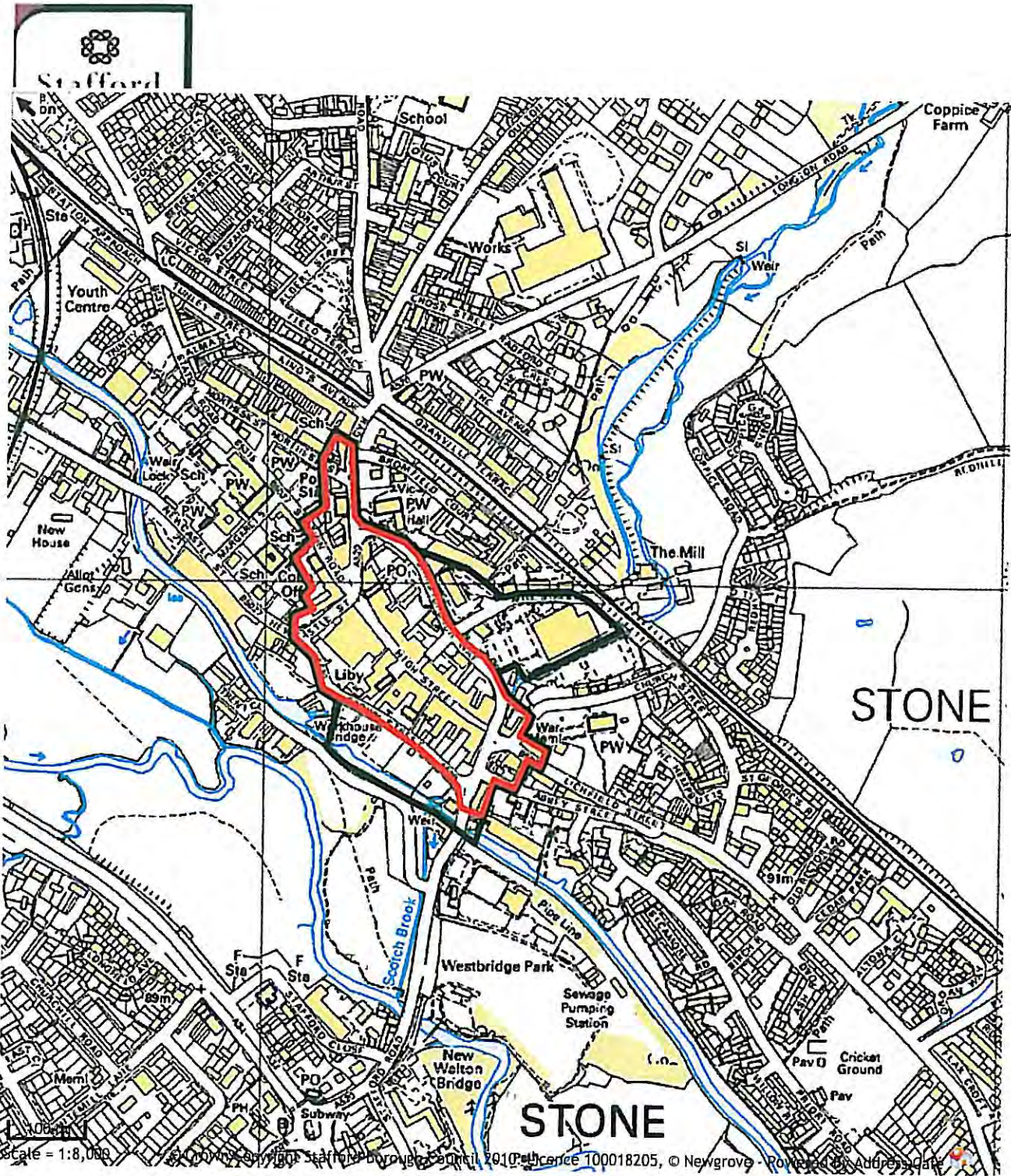
Yours faithfully



*Peacock & Smith*

PEACOCK & SMITH

Enc.





- Town Centre Boundaries 
- Primary Shopping Area Boundary 

## Morrisons Store Exit Survey – Stone 'Other' responses

**Q01 Which of the following best describes your reason for visiting this store today?**

Party food	2
Lotto	1
Meat	1
Milk	1
Offers	1
Oven cleaner	1
Plants	1
Shopping for sister in law	1
Tablets	1
Tea	1
Wine offers	1
<b>Total</b>	<b>12</b>

**Q02 And which of the following do you use this store for on most other occasions?**

Buy veg	1
Christmas shopping	1
DVD	1
<b>Total</b>	<b>3</b>

**Q03 Where did you immediately come from before this store today? Other shopping location**

B&Q, Meir	1
Bank, High Street ,Stone	1
Co-op, High Street, Stone	1
Hairdressers	1
Jewellers	1
Post Office, High street, Stone	1
Costa Coffee, Stone	1
Library, Town Centre	1
Veg shop, High Street, Stone	1
<b>Total</b>	<b>9</b>

**Q03 Where did you immediately come from before this store today? Other**

Dentist	1
Doctors	1
Garage, Stafford	1
Gym	1
Hospital	1
Narrow boat home	1
University	1
Visit nursing home	1
<b>Total</b>	<b>8</b>

**Q04 What is the main reason you choose to shop at this Morrisons store rather than alternative stores? Other**

A trip out	1
Get bread	1
Check prices	1
Close by the river	1
Come for a table	1
Continental veg	1
Drop daughter off at work	1
For a particular product	1
Fruit and veg	1
Gluten free, good range	1
It's a smaller store	1
Lots of room	1
Near to care home, can get home on disabled scooter	1
Nice flowers	1
On way home	1
Passing through	1
Petrol	1
School drop off	1
It is the nearest Morrisons	1
Toilets	1
<b>Total</b>	<b>20</b>

**Q05 And for what other reasons do you choose to shop at this Morrisons store rather than alternative stores? Close to other shopping destination visited / visiting today**

Go to Doctors	1
Stone	1
<b>Total</b>	<b>2</b>

**Q05 And for what other reasons do you choose to shop at this Morrisons store rather than alternative stores? Other**

Petrol	2
Always used it since it was Safeway	1
Bakery	1
Christmas food	1
Easy for my mum to get around	1
Fish counter	1
For a particular product	1
Fresh food	1
Good butcher	1
It's bigger	1
It's where I always go out of habit	1
Know the store	1
Local one	1
Local tip	1
Meat fresh	1
Meat is not halal	1
No other choice	1
On way from University	1
Passing through	1
Shopping in the town	1
Way home	1
<b>Total</b>	<b>22</b>

**Q08 What mode of transport did you use to travel to Morrisons today ?**

Disabled scooter	1
<b>Total</b>	<b>1</b>

**Q09 Where have you parked today ?**

Front Side Clinic	1
Lichfield Road	1
Thompsons staff car park	1
<b>Total</b>	<b>3</b>

**Q13 Why do you never combine a visit to Morrisons with another activity in the town centre ?**

Because I live the opposite side so more out of town	1
First visit	1
Go to Hanley usually, only come here to use Morrisons once a week. Town is too small prefer larger shopping area	1
I don't believe it's fair to park on car park; the spaces should be for Morrisons shoppers	1
I've got my mum and she can't walk there	1
I go to another place. I come to the shop and get it home. If I want to go to Stone I don't shop here	1
I have disabled parents and they cannot walk far, I need to get back with them	1
I just don't want to	1
I'm at work, need food and they sell what I need	1
I'm usually at work so no time	1
I only come for food shopping. I want to get it home, I come at night not in the day like today	1
I only get an hour lunch and I only get a sandwich	1
It's my first time in Stone	1
Probably will in time. Just moved here into care home and this is nearest Stone	1
That I'm disabled, too tired to do anything else	1
We come from Loughton and two hours free parking is not long enough to go into town	1
Would not wish to use disable car parking space here at Morrisons whilst going to town	1
<b>Total</b>	<b>17</b>

**Q14 What was or will these other activities be when combining with a trip to this Morrisons?**

Dentist	1
Library	1
<b>Total</b>	<b>2</b>

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Creswell Parish Council (Mrs Lisa Horritt)
Comment ID	PS150
Response Date	25/02/13 14:57
Consultation Point	9 POLICY STAFFORD 2 ? NORTH OF STAFFORD ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1

#### Files

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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

- . Positively prepared
- . Justified
- . Effective

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

The site - to the North (and East) of Stafford - without strategic infrastructure provision, upfront, cannot be "deliverable" and without such provision cannot be deemed "sustainable" if all that can be foreseen is major congestion and traffic chaos. This is not "positive planning" nor is it "improving the conditions in which people live, work, travel and take leisure ..." either pre or post these developments.

It is the view of Creswell Parish Council that much, much more needs to be brought forward, discussed and debated before the Local Plan - supported by any viable Northern Area Master Plan - is in any way "fit for purpose" and can be seen as robustly "deliverable" ... and be able to withstand public examination and scrutiny at any upcoming Examination in Public.

**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.**

That the Area Master Plan needs to exist prior to acceptance of the Plan's generalised proposals for this area as the undoubted need for major new highway infrastructure provision will have far-reaching, place shaping impact upon the locality (and beyond) and therefore detailed development layouts and proposals must surely wait to follow and fit in with such underlying infrastructure ... a true **PLAN-led** approach. Not something one can attempt to insert after these developments have been approved / commenced construction .. that way disaster lies !! Pro-active planning, not reactive, post-event "fixing" of issues that could and are easily foreseen. Our main body of our detail response follows: - {Appendix, detailed items are appended to each relevant section / paragraph} {The full, combined Response having been loaded at the front of this on-line document}. {Also now added below as an attachment - Word doc} **CRESWELL PARISH COUNCIL A: Introduction / Overview** The Parish Council notes, within paragraph 16 of the National Planning Policy Framework that neighbourhoods should: -

. *plan positively to support local development, shaping and directing development in their area ...*  
Likewise, we note the first of the 12 core Planning Principles that Planning should be:

. ***genuinely plan-led***  
. *empowering people to shape their surroundings...*  
and that they should: -

. *provide a practical framework within which decisions on planning applications can be made **with a high degree of predictability and efficiency.***

With specific reference to the Local Plan - the Plan for Stafford Borough - the Parish Council accepts that it exists in an important growth area for Stafford and, in general, is happy to embrace positive and progressive changes - provided that the appropriate measures are in place to ensure that any such change is beneficial in nature and for the general good of both the immediate and wider localities. It is from that standpoint that it makes these representations to this Pre-submission document. **B: Subject matter of "The Plan for Stafford"** That it: "**Sets out a vision , key objectives, the development strategy , strategic development locations and policies for the future development of the Stafford Borough area.**" Consultees are asked to comment on "**the soundness and legal compliance ...**" of a Plan that aims to achieve a balance of sustainable communities across the Borough. In the Ministerial foreword to the National Planning Policy Framework (NPPF), it clearly sets out the underlying principles: -

. *"The purpose of planning is to help achieve **sustainable development.**"*  
. *"Sustainable means **ensuring that better** lives for ourselves don't mean worse lives for future generations."*  
. *"Sustainable development is about **change for the better ...**"*

And continues, stating that:

. *"Planning must be a creative exercise in finding ways to **enhance and improve** the places in which we live our lives."*

A theme that is then developed throughout the document and, as early as paragraph 1 states that this framework should be one which: -

. *"reflects the **needs and priorities** of their communities."*

In paragraph 7, as part of the "economic role", requiring Local Planning to: -

. *" identify and coordinate developments requirements, **including the provision of infrastructure.***  
. *In ways that should be "**accessible**" and which minimise "**waste and pollution**"*

Paragraph 10:

. *" **taking local circumstances into account**"*

Whilst crucially, Paragraph 30:

. *" **reducing congestion**"*

With, Paragraph 31:

. *"**viable infrastructure to support sustainable development.**"*

To be compliant with NPPF guidelines / ethos / requirements therefore we must be looking for - and as residents be assured of - a Local Plan that will deliver:

. "Sustainable development that is about **positive** growth - making economic, environmental and social **progress** for this and future generations."

Clearly defined development proposals whose outcome can be seen to be forthcoming in a way that "**enhances and improves the places in which we live our lives.**" **C: The Parish Council's overall standpoint** Creswell Parish Council certainly has concerns and deep reservations that there is insufficient detail - in particular when it comes to provision of transport infrastructure ahead of development - that will provide the required level of certainty / "**predictability**" that the local neighbourhood and residents are entitled to expect. As a consequence, we share the concerns of many in that the published Plan for Stafford is not sufficiently robust and strategic in its proposals to ensure that it is in fact a framework upon which future (and major) developments will or indeed can be "**plan-led**" - rather than "developer-led". Whilst large scale development areas are now identified, the concern is that they are being 'allocated' without sufficient attention being paid - and without sufficient strategic policy definition (and clear "intent") being provided - to ensure that appropriate yet basic, integrated and coordinated infrastructure (principally highways and transport provision) will be forthcoming either upfront or even in the medium to long(er) term. The often 'simplistic assumption' appears to be that the local road network "will cope" and that the use of such existing highway facilities can simply be "maximised" in order to cope. But with the obvious demand growth that these major developments will create, this is not considered appropriate or acceptable. Within the proposals for the north end of Stafford, not only is there an absence of any significant additional highway provision in the short term, there is an equally noticeable lack of any clear, realistic or defined strategic provision in either the medium or longer term - despite this Local Plan having a minimum 18 year lifespan. In attending LDF / Local Plan forums throughout 2012 (and prior), questions were consistently asked about overall "deliverability", improved local "infrastructure" (principally roads in general) and about the lack of any visible, positive commitment to the long-awaited, extremely long overdue Eastern Distributor Road; also questions as to "how" these various proposals along the Northern edge of urban Stafford Town were to be "integrated and coordinated". With an absence of any detail / detailed response(s) to these questions, the only consistent response that came increasingly to the fore during 2012 was that these issues would be tackled and the answers would emanate from the "Northern Area Master Plan". That "Area Master Plan" would provide those answers and, having done so, would be the document (and the mechanism for "delivery") that would then underpin the LDF, now the Local Plan, and substantiate it in a sufficiently detailed and robust manner that would enable the combined 'Plans' to be presented to and withstand the rigours of public scrutiny at the Local Plan Examination in Public (to be held in mid 2013). **No such Master Plan yet exists** and so the local communities - our Parish Council included - still do not have any of the answers it needs to allay its fears and genuine concerns; and so struggles to have confidence in, let alone support, this emerging Local Plan. Indeed it seems likely that any such Area Master Plan will not be finalised and available for full public scrutiny and comment until some months after the Examination in Public of the core Local Plan has taken place. Furthermore, a recent public exhibition (January and February 2013), held by the consortium of main Developers for the north of Stafford showed an extended (northwards, east of the A34) area allocated for housing which does not appear at all in the Local Plan and, to the west of the A34, two fields of employment land allocated in the Local Plan which had been completely left out of any integration with the surrounding projects. It is therefore extremely difficult to assess the robustness and deliverability of a plan for the area that includes on page 47, as its opening sentence within the "Infrastructure" section of Policy 2, the statement: -

. " *xiii. Highway capacity improvements, either through or around the perimeter of the site, or along Beaconside, will be required North of Stafford* ".

Is this really the extent of Stafford's Strategic Planning for the next 15-20 years ??? Whilst we acknowledge that "more detailed site-specific" details will eventually follow, it is a matter of great concern that this appears to be scheduled for 2014, at the earliest, and that the local communities are therefore being asked to accept the current proposals "in good - some would say "blind" - faith", trusting that acceptable detail will follow. Not only does this seem to be an approach that in general embraces the concept of "Shutting the stable door after the horse has bolted" but the most worrying aspect is that the most fundamental provision of major, underlying infrastructure - that must, with a high degree of inevitability - fundamentally affect the layout and nature of these large scale developments is also, as yet missing / undefined. How can major areas of future development be approved when no-one yet knows - and no public debate has yet taken place - over the likely (inevitable) provision of significant new highway infrastructure build. All we are told is, in the statement above that: -



- . *Highway capacity improvements, either through or around the perimeter of the site, or along Beaconside, will be required North of Stafford".*

WHAT / WHERE / WHEN / HOW ... Could it be more vague ? A major new highway build either ?around the northern perimeter of these developments sites' or, even more dramatic, ?through the middle of one or more of these sites' can only have a DRAMATIC / FAR-REACHING affect(s) on the as yet purely aspirational, diagrammatic and, at best, illustrative ?proposals' we have seen to date. And yet we are being asked to judge and accept / approve these as "robust, viable and deliverable" strategically proposals". How can that be possible ?? Finally, for this section, The role - or lack of - of the County Council in providing any clear, let alone forward-thinking / strategic guidance in the specifics of new/enhanced highways provision in this geographical area is a matter of great local concern and is having an unwanted but currently inescapable - and heavily detrimental - affect on the soundness of this Local Plan for Stafford. Without this fundamental information, Creswell Parish Council seriously questions: -

- . How this Plan can be "justified" without the robust evidence of future infrastructure (new road) provision;
- . How this proposed Plan can be deemed "effective" when so many fundamental issues have yet to be addressed;
- . How this Plan can be "consistent" with NPPF Policy when it leaves local communities with such uncertainties;
- . How therefore it can be "legally compliant" if it fails to address and take into account such underlying local circumstances.

**D: The Parish Council's general comments** Turning attention and our response to: SUSTAINABLE DELIVERY It is this Council's strongly held view that "Delivery" has to be considered in two parts: - a: Site identification and inclusion within the overall Plan b: Development delivery upon those selected sites. **1(a) Site identification (and deliverability)** With a few exceptions detailed below, we accept that in general terms the due process has been followed and that the general areas identified throughout the Borough are reasonable and appropriate. In terms of our own immediate locality, we therefore repeat our earlier comment to this effect: - Creswell Parish Council accepts that it exists in an important growth area for Stafford and, in general, is happy to embrace positive and progressive changes - *provided that the appropriate measures are in place to ensure that any such change is beneficial in nature and for the general good of both the immediate and wider localities.* (i): Beyond our own immediate area and with reference to the South of the town, we are disappointed with the apparent lack of progress made in discussions with South Staffordshire District Council - resulting in a complete absence of new development to the south of the town. A concern that this is resulting in an undue imbalance and skewing of development to the north of the town and - in the case of the 2,000 houses proposed alongside Beaconside (beyond Common Road), is likely to create a new community at ?arms length' (without any real connectivity or interaction with) the main urban area of Stafford. (ii): The Parish Council takes note of the recently approved Outline Consent for the County-owned land that will form the Redhill Employment Park and has concerns about the future deliverability of the area of the Local Plan employment land allocation (in private ownership) to the immediate north of this site. Access to this most northerly tract of land seems "uncertain" and its integration into the overall pattern of development seems unclear and appears to be in danger of being overshadowed and ?drowned out' by the major developments that now surround it to the South and to the East and by the major investors now controlling these much larger areas. Indeed, whilst the Parish Council supports the integrated provision of new Employment Land for the north of the town, we now note that this particular area of land has clearly been sidelined and, as stated earlier, was not part of the recent proposals (as exhibited by the Developers' consortium for public consultation) for the north end. The access and roads for the Redhill site have been planned and approved and construction is currently in progress, yet no consideration has been made for the extra land. In fact, County Highways have made it clear that they would not allow any further access from the A34 to the land. Sadly, this land has been isolated by the County Council and other developers and is now undeliverable. (iii): The Parish Council also notes a significant discrepancy on the extended Housing Allocation (on the Akzo Nobel land, to the north of recently approved HP13) which, on the information recently displayed at the Public Consultation exhibition hosted by Pegasus / Maximus / King Sturge (representing the Developers' consortium, as per the above), appears to extend much further north than the area shown on the Local Plan. This appears to be an unexplained ?discrepancy'. (iv): As previously discussed, the availability of these land areas may be significantly (severely?) affected and possibly compromised by any forthcoming new highway build. (v): A very new consideration: - The potential impact on this land's availability / deliverability by the recently announced HS2 preferred route to Manchester. **1(b) Development delivery**

**on these sites** Having identified these sites and "included" them in the local Plan is fine BUT there then come a whole series of questions about the ability to deliver acceptable, sustainable developments on these sites ... and to be able to do so in accord with NNPF guidelines - as outlined above. In a manner than **improves and enhances** the area (surrounding area) as a whole, reflecting the **needs and priorities** of both the new and existing communities. (i): The pre-submission Local Plan deals with matters such as the Northern Access Improvement in such vague and general terms as to render effective appraisal - let alone support - almost impossible. Indeed the "Northern Access Improvement Scheme" is **not even marked** on the "Plan for Stafford Borough" map that accompanies the pre-submission document !! It also deals, where such detail exists, almost exclusively with work already identified (as part of the HP13 Consent) on / around Redhill Island and very little else. The draft Stafford Borough 'Integrated Transport Strategy 2011-2026' actually refers, page 4 "Transport Challenges and Opportunities" to this as "Stafford Northern Access Improvements **in the vicinity of Redhill ...**" We also know of the proposed Urban Boulevard enhancements proposed for the short stretch of the A513 Beaconside Road that abuts the HP13 site and the existing Parkside residential estate - but then NOTHING !! The A513 Beaconside Road then simply reverts to its existing single carriageway status. The Pegasus / Maximus Exhibition then shows a further, remarkably and inexplicably short further extended "enhancement" - NO actual details - of this road but only to the MOD No. 4 site ... not even to Sandon Road B5066 (north) and so not even to the full extent of their own housing development. NOTHING is shown, anywhere, about the remainder of the A513 Beaconside Road from the area adjacent to these developments, for the rest of its entire length out through to the University and the A518 Weston Road. (ii): Even if, for a moment we accept the intent for effective highway provision improvements for the Stafford North area, the only supporting evidence that exists to support the "**Justification**" of this Plan, "**founded on robust evidence**" - as we are asked to comment on - is: The Stafford Borough Infrastructure Strategy - Stage 2 Infrastructure Delivery Plan Final Report July 2012 ... not that this document has ever been put forward for public information / consultation or debate - but it nonetheless exists as the Borough Council's Transport evidence base. Within which document we find the following: - Stafford Northern Access Improvements Paragraph 4.1.2 (through to 4.1.15) "*Modelling of around 2,000 new homes to the north of the town has been carried out together with a Traffic Assessment for SCC owned land for new employment north of Redhill and west of A34, including impacts on M6 Junction 14.*" Before the document goes on to concede that: - "*However the Draft Plan for Stafford Borough considers a different distribution of development with the northern Strategic Development location hosting a higher level of residential development.*" **YES, a 50% HIGHER NUMBER OF HOUSES. Not 2,000 houses but 3,100 houses. And yet, this is the (only) Transport evidence base upon which such "strategic planning" is being based !!** The document continues and acknowledges that: "*Master planning and technical work will inform the development of a more significant infrastructure package to make this level of development acceptable in transport and connectivity terms.*" **And so the only infrastructure study (evidence base) we have is 50% understated.** We are therefore being asked to accept and support a Local Plan for a 5% growth in the population of Stafford, concentrated in one relatively small area to the north of the town, without / ahead of any accurate modelling or transport assessment for the impact this will have on the area and/or what new and additional infrastructure will be required. This is a strategic plan !!

- . A Strategic Plan that empowers local communities to make informed decisions that will affect their everyday lives now and in the immediate and longer term future.
- . A Strategic Plan that we are supposed to assess and endorse as being "sustainable" and one that will (NNPF Ministerial Foreword) bring "economic and social progress for this and future generations"?

As the Local Plan document itself says, paragraph 1.2: -

- . "*... new development that meets local needs ... whilst **protecting the existing high quality of life in the Borough.***"

Surrounding an already seriously congested road network with 3,100 houses without any form indication of what measures will be put in place / new highway infrastructure will be provide to make that situation bearable for those who already live in the area and will come to live in the area in the future !!

Sustainable development that **meets the needs of the present without compromising the needs (and quality of life) of future generations**. Meeting the **needs and priorities** of both the new and existing communities. On what possible basis can this (part of this) Plan be "justified" or deemed either "robust" or "deliverable" ? (iii): The Eastern Access Improvement: - In attending LDF / Local Plan forums throughout 2012 (and prior), questions were consistently asked - not only by Creswell Council and residents but by Stafford residents from all quarters - about overall "deliverability", improved local

"infrastructure" (principally roads in general ) and about the lack of any visible, positive commitment to the long-awaited, extremely long overdue **Eastern Distributor Road**. There has also been consistent criticism about the suggestion that the short stretch of road from the A518, past proposed new housing developments to St Thomas' Lane is somehow to be effective as the "Eastern Access Improvement Scheme - serving as it would do, simply to facilitate traffic movements in/out of this new residential development ... with even further criticism that, having emerged onto St Thomas' Lane traffic options as to where to go from there are severely limited. The three (four) narrow bridges to Baswich Lane already being acknowledged as a bottleneck ... and Baswich Lane itself described to us as "self-regulating" - being transport-speak for "unable to cope with any more traffic.

. Put simply - this new, short stretch of road would be a road "to nowhere".

It would certainly do little if anything to improve Eastern Access to Stafford town. It was therefore with complete incredulity that we read this latest document only to discover that this quirky road proposal had now been re-labelled as "Phase 1 - Eastern Distributor Road." Even if we were, for one short moment, to accept it on face value, it immediately begs the questions: 1: Where / when are Phases 2 / 3 / 4 ... leading to EDR completion

. No mention anywhere (over the next 18 years !!)

2: What is the route of the EDR of which this is now a part??

. No mention anywhere in the entire written document.

Only if an individual who knows what they are searching for, drills down about 4 layers into the on-line "Plan for Stafford Borough" map - which is not even an immediately obvious attachment to the on-line Consultation Document - can one suddenly find a dotted blue-line "route" for the future EDR. Our own Parish Council only found out about this "EDR Route" when for other reasons, we requested and obtained a printed copy of the above Plan for the Borough. Since which time, no-one resident or Councillor that we have spoken to even knew there was an EDR Route !! Having been consistently told at all LDF and other Transport Forums that "there are no current plans for building the EDR" - followed by a raft of excuses masquerading as reasons against its construction - and that there would be no Plans for including an EDR in any Local Plan for the foreseeable future, it is frankly unbelievable to see this one-off, short, road to nowhere, magically relabelled as part of an actual EDR route. There is no evidential base, no evidential documentation (save this one map) to give any credence to this "route" or to any concrete plans to ever build the EDR.

. It is not mentioned anywhere in the Stafford Borough Infrastructure Strategy - Stage 2 - Infrastructure Delivery Plan, Final Report : July 2012

. It is not mentioned in the (SCC) Draft Stafford Borough Integrated Transport Study 2100- 2026

. It is not mentioned in the (SCC) District Integrated Transport Strategy - Report on the Outcome of the Consultation Process 2011 / 2012

. It is not mentioned anywhere in (SCC) Appendix 2.2 : Community Infrastructure Fund Bid for a Package of Sustainable Transport Measures for Stafford

And, for what would after all be a major arterial route / by-pass / highway enhancement for Stafford Town - developed over a series of phases - is not mentioned (other than this short stretch to St Thomas' Lane aka, until this most recent document, the Eastern Access Improvement Scheme) **anywhere** in the entire pre-submission Local Plan for Stafford document other than nine near-identical and 'passing references' to this single, short stretch of road.

. **No other mention of the rest of the route, let alone any further phasing.**

And so this short stretch of residential estate access roadway is, as Phase 1, the only stretch of this EDR contemplated within the next 18 years. Some phasing that !!! Finally on this point, given that there is no enhancement shown for the majority of the A513 Beaconside from west of Sandon Road (north) along the remaining 2/3rds of this busy and congested road - there is no 'joined up thinking' that would see the existing Beaconside Road upgraded to play its part in any (future) EDR / By-pass route around the Northwest of Stafford town. That Stafford's residents are expected to give any credence to the highway provision to facilitate any of the proposed developments to the North and to the West of Stafford frankly beggars believe.

. It cannot be "justified" - it is not founded on any definable, let alone robust, evidence.

. It cannot be "effective" when built on such inadequate premise(s).

. It cannot be consistent with NNPF requirements when there are such huge holes in its "strategic provision".

. How then can it be legally compliant, when such obvious information, evidence supporting documentation and public consultation over such measures is so clearly absent?

**E: Conclusion** These sites - to the North (and East) of Stafford - without strategic infrastructure provision, upfront, cannot be "deliverable" and without such provision cannot be deemed "sustainable" if all that can be foreseen is major congestion and traffic chaos. This is not "positive planning" nor is it "improving the conditions in which people live, work, travel and take leisure ..." either pre or post these developments. **Creswell Parish Council cannot therefore support the Local Plan proposals for its area on such a basis.** **F: Additional detailed comments** We attach an appendix to this submission within which we have responded in more detail to specific and individual section - paragraphs and Policies - of the pre-submission Local Plan document. Notes: 1: Although we will add these into the online system at the relevant points, for the convenience of the reader, we also leave them attached as a single Appendix to this main body of our response - which we will load as a single attachment file. 2: In addition, since we believe that the failure to adequately identify, provide delivery actions and policies for the (major) new highway infrastructure provision required by the proposed developments at the North (and West) of Stafford is such as to potentially affect the whole of Stafford town, we intend to load this entire document at the front of the on-line Consultation, but will also add the main body of this Response (as per the pages above) to Section 7 Stafford, **Policy Stafford 2 - North of Stafford** ; where it is of specific, detailed relevance. **G: Next steps** The Parish Council wishes to be kept fully informed of progress and, specifically, to be informed as/when the Plan for Stafford Borough DPD has been submitted to the Secretary of State for Independent Examination - an examination at which the Parish Council will almost certainly seek to be represented.

*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

**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**

To contribute to the debate on the issues raised.

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.**

[Creswell SBC Local Plan 2013 - PreSubmission Consulktaion Response - Feb 2013 \(1\)](#)  
[Creswell SBC Local Plan 2013 - PreSubmission Consulktaion Response - Feb 2013](#)  
[Full Response inc. Appendix](#)

# CRESWELL PARISH COUNCIL

Registration No. PZ7347355 – Data Protection – Freedom of Information Act 2000

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Date 24<sup>th</sup> February 2013.

Head of Planning & Regeneration Services  
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## The Plan for Stafford Borough Publication (pre-submission)

### Response to Consultation - February 2013

Dear Sirs,

## Parish Council Response

### **A: Introduction / Overview**

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Likewise, we note the first of the 12 core Planning Principles that Planning should be:

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and that they should: -

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is happy to embrace positive and progressive changes - provided that the appropriate measures are in place to ensure that any such change is beneficial in nature and for the general good of both the immediate and wider localities.

It is from that standpoint that it makes these representations to this Pre-submission document.

**B: Subject matter of ‘The Plan for Stafford’**

That it:

*“Sets out **a vision**, key objectives, **the development strategy**, strategic development locations and **policies** for the future development of the Stafford Borough area.”*

Consultees are asked to comment on *“**the soundness** and legal compliance ...”* of a Plan that aims to achieve a balance of sustainable communities across the Borough.

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A theme that is then developed throughout the document and, as early as paragraph 1 states that this framework should be one which: -

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In ways that should be **“accessible”** and which minimise **“waste and pollution”**

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Whilst crucially,  
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With, Paragraph 31:

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To be compliant with NNPF guidelines / ethos / requirements therefore we must be looking for – and as residents be assured of – a Local Plan that will deliver:

*“Sustainable development that is about **positive** growth – making economic, environmental and social **progress** for this and future generations.”*

Clearly defined development proposals whose outcome can be seen to be forthcoming in a way that **“enhances and improves the places in which we live our lives.”**

### **C: The Parish Council’s overall standpoint**

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As a consequence, we share the concerns of many in that the published Plan for Stafford is not sufficiently robust and strategic in its proposals to ensure that it is in fact a framework upon which future (and major) developments will or indeed can be **“plan-led”** - rather than “developer-led”.

Whilst large scale development areas are now identified, the concern is that they are being ‘allocated’ without sufficient attention being paid – and without sufficient strategic policy definition (and clear “intent”) being provided – to ensure that appropriate yet basic, integrated and coordinated infrastructure (principally highways and transport provision) will be forthcoming either upfront or even in the medium to long(er) term.

The often ‘simplistic assumption’ appears to be that the local road network “will cope” and that the use of such existing highway facilities can simply be “maximised” in order to cope. But with the obvious demand growth that these major developments will create, this is not considered appropriate or acceptable.

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In attending LDF / Local Plan forums throughout 2012 (and prior), questions were consistently asked about overall “deliverability”, improved local “infrastructure” (principally roads in general) and about the lack of any visible, positive commitment to the long-awaited, extremely long overdue Eastern Distributor Road; also questions as to “how” these various proposals along the Northern edge of urban Stafford Town were to be “integrated and coordinated”.

With an absence of any detail / detailed response(s) to these questions, the only consistent response that came increasingly to the fore during 2012 was that these issues would be tackled and the answers would emanate from the “Northern Area Master Plan”.

That “Area Master Plan” would provide those answers and, having done so, would be the document (and the mechanism for “delivery”) that would then underpin the LDF, now the Local Plan, and substantiate it in a sufficiently detailed and robust manner that would enable the combined ‘Plans’ to be presented to and withstand the rigours of public scrutiny at the Local Plan Examination in Public (to be held in mid 2013).

**No such Master Plan yet exists** and so the local communities – our Parish Council included – still do not have any of the answers it needs to allay its fears and genuine concerns; and so struggles to have confidence in, let alone support, this emerging Local Plan.

Indeed it seems likely that any such Area Master Plan will not be finalised and available for full public scrutiny and comment until some months after the Examination in Public of the core Local Plan has taken place. Furthermore, a recent public exhibition (January and February 2013), held by the consortium of main Developers for the north of Stafford showed an extended (northwards, east of the A34) area allocated for housing which does not appear at all in the Local Plan and, to the west of the A34, two fields of employment land allocated in the Local Plan which had been completely left out of any integration with the surrounding projects.

It is therefore extremely difficult to assess the robustness and deliverability of a plan for the area that includes on page 47, as its opening sentence within the “Infrastructure” section of Policy 2, the statement: -

*“xiii. Highway capacity improvements, either through or around the perimeter of the site, or along Beaconside, will be required North of Stafford”.*

Is this really the extent of Stafford’s Strategic Planning for the next 15-20 years ???

Whilst we acknowledge that “more detailed site-specific” details will eventually follow, it is a matter of great concern that this appears to be scheduled for 2014, at the earliest, and that the local communities are therefore being asked to accept the current proposals “in good – some would say “blind” – faith”, trusting that acceptable detail will follow.



Not only does this seem to be an approach that in general embraces the concept of “Shutting the stable door after the horse has bolted” but the most worrying aspect is that the most fundamental provision of major, underlying infrastructure – that must, with a high degree of inevitability – fundamentally affect the layout and nature of these large scale developments is also, as yet missing / undefined.

How can major areas of future development be approved when no-one yet knows – and no public debate has yet taken place - over the likely (inevitable) provision of significant new highway infrastructure build. All we are told is, in the statement above that: -

*Highway capacity improvements, either through or around the perimeter of the site, or along Beaconside, will be required North of Stafford”.*

WHAT / WHERE / WHEN / HOW ...

Could it be more vague ?

A major new highway build either ‘around the northern perimeter of these developments sites’ or, even more dramatic, ‘through the middle of one or more of these sites’ can only have a DRAMATIC / FAR-REACHING affect(s) on the as yet purely aspirational, diagrammatic and, at best, illustrative ‘proposals’ we have seen to date.

And yet we are being asked to judge and accept / approve these as “robust, viable and deliverable” strategically proposals”.

How can that be possible ??

Finally, for this section,

The role – or lack of – of the County Council in providing any clear, let alone forward-thinking / strategic guidance in the specifics of new/enhanced highways provision in this geographical area is a matter of great local concern and is having an unwanted but currently inescapable – and heavily detrimental – affect on the soundness of this Local Plan for Stafford.

Without this fundamental information, Creswell Parish Council seriously questions: -

- How this Plan can be “justified” without the robust evidence of future infrastructure (new road) provision;
- How this proposed Plan can be deemed “effective” when so many fundamental issues have yet to be addressed;
- How this Plan can be “consistent” with NPPF Policy when it leaves local communities with such uncertainties;

- How therefore it can be “legally compliant” if it fails to address and take into account such underlying local circumstances.

**D: The Parish Council’s general comments**

Turning attention and our response to:

SUSTAINABLE DELIVERY

It is this Council’s strongly held view that “Delivery” has to be considered in two parts: -

- a: Site identification and inclusion within the overall Plan
- b: Development delivery upon those selected sites.

**1(a) Site identification (and deliverability)**

With a few exceptions detailed below, we accept that in general terms the due process has been followed and that the general areas identified throughout the Borough are reasonable and appropriate.

In terms of our own immediate locality, we therefore repeat our earlier comment to this effect: -

Creswell Parish Council accepts that it exists in an important growth area for Stafford and, in general, is happy to embrace positive and progressive changes - *provided that the appropriate measures are in place to ensure that any such change is beneficial in nature and for the general good of both the immediate and wider localities.*

- (i): Beyond our own immediate area and with reference to the South of the town, we are disappointed with the apparent lack of progress made in discussions with South Staffordshire District Council – resulting in a complete absence of new development to the south of the town.  
A concern that this is resulting in an undue imbalance and skewing of development to the north of the town and – in the case of the 2,000 houses proposed alongside Beaconside (beyond Common Road), is likely to create a new community at ‘arms length’ (without any real connectivity or interaction with) the main urban area of Stafford.
- (ii): The Parish Council takes note of the recently approved Outline Consent for the County-owned land that will form the Redhill Employment Park and has concerns about the future deliverability of the area of the Local Plan employment land allocation (in private ownership) to the immediate north of this site.

Access to this most northerly tract of land seems “uncertain” and its integration into the overall pattern of development seems unclear and appears to be in danger of being overshadowed and ‘drowned out’ by the major developments that now surround it to the South and to the East and by the major investors now controlling these much larger areas. Indeed, whilst the Parish Council supports the integrated provision of new Employment Land for the north of the town, we now note that this particular area of land has clearly been sidelined and, as stated earlier, was not part of the recent proposals (as exhibited by the Developers’ consortium for public consultation) for the north end. The access and roads for the Redhill site have been planned and approved and construction is currently in progress, yet no consideration has been made for the extra land. In fact, County Highways have made it clear that they would not allow any further access from the A34 to the land. Sadly, this land has been isolated by the County Council and other developers and is now undeliverable.

- (iii): The Parish Council also notes a significant discrepancy on the extended Housing Allocation (on the Akzo Nobel land, to the north of recently approved HP13) which, on the information recently displayed at the Public Consultation exhibition hosted by Pegasus / Maximus / King Sturge (representing the Developers’ consortium, as per the above), appears to extend much further north than the area shown on the Local Plan.

This appears to be an unexplained ‘discrepancy’.

- (iv): As previously discussed, the availability of these land areas may be significantly (severely?) affected and possibly compromised by any forthcoming new highway build.
- (v): A very new consideration: - The potential impact on this land’s availability / deliverability by the recently announced HS2 preferred route to Manchester.

### **1(b) Development delivery on these sites**

Having identified these sites and “included” them in the local Plan is fine BUT there then come a whole series of questions about the ability to deliver acceptable, sustainable developments on these sites ... and to be able to do so in accord with NNPF guidelines – as outlined above.

In a manner than **improves and enhances** the area (surrounding area) as a whole, reflecting the **needs and priorities** of both the new and existing communities.

- (i): The pre-submission Local Plan deals with matters such as the Northern Access Improvement in such vague and general terms as to render effective appraisal – let alone support - almost impossible.

Indeed the “Northern Access Improvement Scheme” is **not even marked** on the “Plan for Stafford Borough” map that accompanies the pre-submission document !!

It also deals, where such detail exists, almost exclusively with work already identified (as part of the HP13 Consent) on / around Redhill Island and very little else.

The draft Stafford Borough ‘Integrated Transport Strategy 2011-2026’ actually refers, page 4 “Transport Challenges and Opportunities” to this as “Stafford Northern Access Improvements **in the vicinity of Redhill ...**”

We also know of the proposed Urban Boulevard enhancements proposed for the short stretch of the A513 Beaconside Road that abuts the HP13 site and the existing Parkside residential estate – but then NOTHING !!

The A513 Beaconside Road then simply reverts to its existing single carriageway status.

The Pegasus / Maximus Exhibition then shows a further, remarkably and inexplicably short further extended “enhancement” – NO actual details – of this road but only to the MOD No. 4 site ... not even to Sandon Road B5066 (north) and so not even to the full extent of their own housing development.

NOTHING is shown, anywhere, about the remainder of the A513 Beaconside Road from the area adjacent to these developments, for the rest of its entire length out through to the University and the A518 Weston Road.

(ii):

Even if, for a moment we accept the intent for effective highway provision improvements for the Stafford North area, the only supporting evidence that exists to support the “**Justification**” of this Plan, “*founded on robust evidence*” – as we are asked to comment on – is:

The Stafford Borough Infrastructure Strategy – Stage 2  
Infrastructure Delivery Plan  
Final Report  
July 2012

... not that this document has ever been put forward for public information / consultation or debate – but it nonetheless exists as the Borough Council’s Transport evidence base.

Within which document we find the following: -

Stafford Northern Access Improvements  
Paragraph 4.1.2 (through to 4.1.15)

*“Modelling of around 2,000 new homes to the north of the town has been carried out together with a Traffic Assessment for SCC owned land for new employment north of Redhill and west of A34, including impacts on M6 Junction 14.”*

Before the document goes on to concede that: -

*“However the Draft Plan for Stafford Borough considers a different distribution of development with the northern Strategic Development location hosting a higher level of residential development.”*

YES, a 50% HIGHER NUMBER OF HOUSES.

**Not 2,000 houses but 3,100 houses.**

**And yet, this is the (only) Transport evidence base upon which such “strategic planning” is being based !!**

The document continues and acknowledges that:

*“Master planning and technical work will inform the development of a more significant infrastructure package to make this level of development acceptable in transport and connectivity terms.”*

**And so the only infrastructure study (evidence base) we have is 50% understated.**

We are therefore being asked to accept and support a Local Plan for a 5% growth in the population of Stafford, concentrated in one relatively small area to the north of the town, without / ahead of any accurate modelling or transport assessment for the impact this will have on the area and/or what new and additional infrastructure will be required.

This is a strategic plan !!

A Strategic Plan that empowers local communities to make informed decisions that will affect their everyday lives now and in the immediate and longer term future.

A Strategic Plan that we are supposed to assess and endorse as being “sustainable” and one that will (NNPF Ministerial Foreword) bring “economic and social progress for this and future generations”?

As the Local Plan document itself says, paragraph 1.2: -

*“... new development that meets local needs ... whilst **protecting the existing high quality of life in the Borough.**”*

Surrounding an already seriously congested road network with 3,100 houses without any form indication of what measures will be put in place / new highway infrastructure will be provide to make that situation bearable for those who already live in the area and will come to live in the area in the future !!

Sustainable development that **meets the needs of the present without compromising the needs (and quality of life) of future generations.**

Meeting the **needs and priorities** of both the new and existing communities.

On what possible basis can this (part of this) Plan be “justified” or deemed either “robust” or “deliverable” ?

(iii):

The Eastern Access Improvement

In attending LDF / Local Plan forums throughout 2012 (and prior), questions were consistently asked – not only by Creswell Council and residents but by Stafford residents from all quarters - about overall “deliverability”, improved local “infrastructure” (principally roads in general) and about the lack of any visible, positive commitment to the long-awaited, extremely long overdue **Eastern Distributor Road.**

There has also been consistent criticism about the suggestion that the short stretch of road from the A518, past proposed new housing developments to St Thomas’ Lane is somehow to be effective as the “Eastern Access Improvement Scheme – serving as it would do, simply to facilitate traffic movements in/out of this new residential development ... with even further criticism that, having emerged onto St Thomas’ Lane traffic options as to where to go from there are severely limited.

The three (four) narrow bridges to Baswich Lane already being acknowledged as a bottleneck ... and Baswich Lane itself described to us as “self-regulating” – being transport-speak for “unable to cope with any more traffic.

Put simply – this new, short stretch of road would be a road “to nowhere”.

It would certainly do little if anything to improve Eastern Access to Stafford town.

It was therefore with complete incredulity that we read this latest document only to discover that this quirky road proposal had now been re-labelled as “Phase 1 – Eastern Distributor Road.”

Even if we were, for one short moment, to accept it on face value, it immediately begs the questions:

1: Where / when are Phases 2 / 3 / 4 ... leading to EDR completion

No mention anywhere (over the next 18 years !!)

2: What is the route of the EDR of which this is now a part??

No mention anywhere in the entire written document.

Only if an individual who knows what they are searching for, drills down about 4 layers into the on-line “Plan for Stafford Borough” map – which is not even an immediately obvious attachment to the on-line Consultation Document – can one suddenly find a dotted blue-line “route” for the future EDR.

Our own Parish Council only found out about this “EDR Route” when for other reasons, we requested and obtained a printed copy of the above Plan for the Borough.

Since which time, no-one resident or Councillor that we have spoken to even knew there was an EDR Route !!

Having been consistently told at all LDF and other Transport Forums that “there are no current plans for building the EDR” – followed by a raft of excuses masquerading as reasons against its construction – and that there would be no Plans for including an EDR in any Local Plan for the foreseeable future, it is frankly unbelievable to see this one-off, short, road to nowhere, magically relabelled as part of an actual EDR route.

There is no evidential base, no evidential documentation (save this one map) to give any credence to this “route” or to any concrete plans to ever build the EDR.

It is not mentioned anywhere in the Stafford Borough Infrastructure Strategy – Stage 2 - Infrastructure Delivery Plan, Final Report : July 2012

It is not mentioned in the (SCC) Draft Stafford Borough Integrated Transport Study 2100- 2026

It is not mentioned in the (SCC) District Integrated Transport Strategy – Report on the Outcome of the Consultation Process 2011 / 2012

It is not mentioned anywhere in (SCC) Appendix 2.2 : Community Infrastructure Fund Bid for a Package of Sustainable Transport Measures for Stafford

And, for what would after all be a major arterial route / by-pass / highway

enhancement for Stafford Town – developed over a series of phases – is not mentioned (other than this short stretch to St Thomas’ Lane aka, until this most recent document, the Eastern Access Improvement Scheme) **anywhere** in the entire pre-submission Local Plan for Stafford document other than nine near-identical and ‘passing references’ to this single, short stretch of road.

**No other mention of the rest of the route, let alone any further phasing.**

And so this short stretch of residential estate access roadway is, as Phase 1, the only stretch of this EDR contemplated within the next 18 years.

Some phasing that !!!

Finally on this point, given that there is no enhancement shown for the majority of the A513 Beaconside from west of Sandon Road (north) along the remaining 2/3rds of this busy and congested road – there is no ‘joined up thinking’ that would see the existing Beaconside Road upgraded to play its part in any (future) EDR / By-pass route around the Northwest of Stafford town.

That Stafford’s residents are expected to give any credence to the highway provision to facilitate any of the proposed developments to the North and to the West of Stafford frankly beggars believe.

- It cannot be “justified” – it is not founded on any definable, let alone robust, evidence.
- It cannot be “effective” when built on such inadequate premise(s).
- It cannot be consistent with NNPF requirements when there are such huge holes in its “strategic provision”.
- How then can it be legally compliant, when such obvious information, evidence supporting documentation and public consultation over such measures is so clearly absent?

**E: Conclusion**

These sites – to the North (and East) of Stafford – without strategic infrastructure provision, upfront, cannot be “deliverable” and without such provision cannot be deemed “sustainable” if all that can be foreseen is major congestion and traffic chaos.

This is not “positive planning” nor is it “improving the conditions in which people live, work, travel and take leisure ...” either pre or post these developments.

**Creswell Parish Council cannot therefore support the Local Plan proposals for its area on such a basis.**



**F: Additional detailed comments**

We attach an appendix to this submission within which we have responded in more detail to specific and individual section – paragraphs and Policies – of the pre-submission Local Plan document.

Notes:

1:

Although we will add these into the online system at the relevant points, for the convenience of the reader, we also leave them attached as a single Appendix to this main body of our response – which we will load as a single attachment file.

2:

In addition, since we believe that the failure to adequately identify, provide delivery actions and policies for the (major) new highway infrastructure provision required by the proposed developments at the North (and West) of Stafford is such as to potentially affect the whole of Stafford town, we intend to load this entire document at the front of the on-line Consultation, but will also add the main body of this Response (as per the pages above) to Section 7 Stafford, **Policy Stafford 2 – North of Stafford**; where it is of specific, detailed relevance.

**G: Next steps**

The Parish Council wishes to be kept fully informed of progress and, specifically, to be informed as/when the Plan for Stafford Borough DPD has been submitted to the Secretary of State for Independent Examination – an examination at which the Parish Council will almost certainly seek to be represented.

Yours sincerely,

**L. Horritt.**

Lisa Horritt (Mrs), Clerk to Creswell Parish Council

## **APPENDIX**

Reference specific sections of the pre-submission Plan document:

### **Paragraph 1.1**

With specific reference to proposed developments alongside Beaconside: whilst the Plan “directs where new development will take place” and begins to “describe what changes will occur” it **fails**, in the absence of highway infrastructure detail to adequately identify “how places will be shaped in the future.”

Simply saying that more site-specific detail will follow is not sufficient to render this strategic document “effective” or underpin its “deliverability.”

The provision of such area-wide and fundamental infrastructure supersedes individual site-specific detail – and only when this higher level detail is known can the “effective” nature of these proposals be judged.

### **Paragraph 1.2**

A “vision” without the underlying infrastructure that will, by its very nature, define the area it supports cannot claim to have effective “place-shaping objectives”.

Likewise this omission makes it extremely difficult to assess the “effectiveness” (delivery) or “justification” (without this base information and the clear evidence to support the chosen option(s)) and so confounds attempts to assess whether these unspecified decisions would be “consistent” with NNPF requirements: -

*“to ensure development meets local needs ... whilst protecting and enhancing the existing high quality of life in the Borough.”*

Since failure to properly meet these “local needs” (now and post developments) may very well diminish, rather than protect and enhance, the existing quality of life ... increased traffic congestion, queuing / standing traffic with all its associated exhaust fume pollution, etc.

And yet, **Paragraph 1.13** states that this document “*contains the development strategy, policies on how to deliver the Local Plan’s vision ...* which, in this vital regard, we consider that **it does not**.”

### **Paragraph 2.25**

This proposed local Plan makes considerable incursions into the “unspoilt countryside” to the north of the town – an incursion that could be made even worse by the potential of a new highway infrastructure, as per Policy2, sub-section xiii “*around the perimeter i.e. to the north of the site ...*”

There may, in the event be no objection to such a new highway – but the Plan is totally non-specific and therefore, as Consultees and local residents, we simply do not know.

### **Paragraph 3.3**

“sustainable development ... balance ... future generations ...” cannot be permitted to include a situation whereby existing roads are even more congested than they are now, rendering quick, effective and efficient access impossible or at the very least intolerable.

To suggest that the existing, congested roads can cope with all demands imposed upon it for the next 18 years, whilst contemplating creating a 5% growth in the residential population of the Borough in this one condensed location cannot be “justified” or sustained as an “effective” strategy.

### **Paragraph 3.5**

- ... *including the provision of infrastructure*
- ... *accessible local services* ... for which one does not have to endure excessive, traffic congested journeys
- *Environment* not polluted by bumper-to-bumper traffic congestion at all peak times and whenever there are problems on any of the surrounding roads – the M6 motorway in particular.

### **Paragraph 3.12**

In the absence of a perceived lack of agreement and progress in talks between Stafford Borough and South Staffordshire District Council what realistic hope is there for the EDR (Eastern Distributor Road) ever reaching Junction 13 of the M6 ?

### **Paragraph 3.13 Neighbourhood Planning**

To note that Creswell Parish Council is effectively prevented from being able to prepare and present a Neighbourhood Plan by virtue of majority of the Parish being within a designated ‘major strategic development area’.

### **Paragraph 3.15 / 3.16 /3.17**

- Provision for local communities
- The need for new infrastructure improvements
- Delivery of key infrastructure

... and high on everyone's agenda is "more roads" – including an Eastern Distributor Road to provide a through-route and bypass for Stafford town centre – and yet this 18 year strategic Plans throws no effective light (or hope) on these matters.

Local communities here at the north end of Stafford suffer frequent holdups and road blockages the moment anything untoward occurs anywhere on the M6 from Junction 12 in the south to Junction 16 in the north.

The vast majority of this traffic is forced along the A34, through the centre of town – for which the only practical, available route is along Queensway and so the entire town centre 'locks up' at a huge cost to local businesses.

Despite the imminent construction of two new supermarkets (Morrisons and the new Marks & Spencer complex) there is no relief offered for such circumstances.

NOT an "effective" way forward.

### **Paragraph 3.20 Outcome 2:**

Can this Plan really put forward Stafford as an "aspirational place to live" if the daily journey to work is so fraught with difficulty ... when it can , in the present day , take anything in excess of 20 minutes for the 2-mile journey across town – be that by private car or by public transport.

And when employees find it quicker to commute 15 miles into Stafford from other conurbations and local villages rather than face what is frequently a 50-minute commute from one side of Stafford to their workplace on the other side of town.

**Congestion is the big problem Stafford has to get to grips with ... and it can / will only get worse with such major new developments in the pipeline.**

### **Paragraph 5.1 Spatial vision (f)**

- (f) ... convenient sustainable connections from / to new developments

- (i) new ... developments supported by ... new infrastructure provision

In terms of enhanced and improved highway capacity – and the daily commute will always exist even if only “from one side of town to the other” – we simply do not see any strategic solutions outlined in this Local Plan ... and 18 years is a long time to (a) get things wrong and then (b) struggle to put things right retrospectively.

**SPATIAL POLICY 1** says the right words in seeking to “*improve the economical, social and **environmental** conditions in the area*” but, as the local Parish Council, we struggle to see how / where / when these fine words manifest themselves into reality and into practical, upfront provision.

If this were truly a “plan-led” Strategic Document then we might have (slightly) more confidence but, having initially identified areas and strategic development sites, too much is then left to become “developer led” ... the most obvious example of which is handing the preparation of the Area Master Plans over to the development consortia to see what they come up with / what they will offer ... which in any commercial, finance-driven world, will (we fear) be as little as possible – the minimum that can be got away with.

At the risk of repeating ourselves, we see no strategic “delivery plan” for our area.

### **Paragraph 6.23**

Talks about “... *growth .. together with new transport and social infrastructure* ... such that Stafford continues “to be a vibrant and active community” but we struggle to see those fine words translated into action points within the detail of the proposals put forward in The Plan to date. Consequently our fear is that our local community(ies) will be strangled by inadequate and increasingly congested roads and therefore that these otherwise exciting new developments will become a curse rather than a blessing.

We wish to see proactive, advance planning and not have to face the long-winded, uphill struggle for retrospective fixing of problems generated by such large scale developments.

continues over ...

We would wish to support the principles of:

**SPATIAL PRINCIPLE 7 (SP7) – Supporting the location of new development: -**

(e) that these are “*the most sustainable in terms of impact on existing infrastructure, or demonstrate that infrastructure can be provided to address development issues*”

in ways that will:

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

(l) that “*will not adversely affect the residential amenity of the locality.*”

But we then struggle to find anything else, anywhere else in the document to provide concrete evidence / assurance that these things will happen.

We would cite, as a current example, the new Redhill Employment site which included in its Application Justification that a Park & Ride facility would (“could”) be incorporated within the site but find nothing since to afford us any confidence that such a facility will ever actually come to fruition – an “aspiration” that is more than likely to ‘wither on the vine’.

Likewise any (future) provision for overnight HGV parking ... and yet we already suffer the congestion, environmental damage and pollution of excessive and unwarranted overnight HGV parking on Prime Point 14 / ProLogis Park that is damaging pavements, kerb stones, grassed areas and generally blighting the area on a daily basis.

Something that, as it stands, the Redhill Employment Park will only exacerbate.

WHY? Because there is no actual, concrete, Borough-led (or County-led) Strategy or Policy to do anything about it ... instead just classic developer-led plans that simply ignore local needs and duck local problems, even when they themselves are the inherent cause of those problems.

Once bitten, twice shy ... and Creswell Parish Council and local residents have been bitten more than once !!

Which is why, in an 18-year Local Plan Strategy document, we are looking for such assurances ... but failing to find them.

continues over ...

## Policy Stafford 1 – Stafford Town (page 37)

=1=

The main body of our Response refers to this section, wherein (firstly) we make specific reference to the Northern Access Improvement Scheme (as per ‘Housing’ sub. Paragraph (a)) and what is now referred to as Phase 1 of the Eastern Distributor Road (aka the Eastern Access Improvement Scheme – Housing, sub. Paragraph (c)).

Further noting – with regard to Infrastructure (road) provision i.e. the limited Northern Access Improvements (aka enhancements to Redhill Island) and the absence of any enhancements at all to the western 2/3rds of Beaconside Road (A513) – that we do not consider these provisions come anywhere close to providing an integrated solution that, in any way, forms a viable EDR ... Phase 1 or otherwise.

=2=

### Paragraph 7.18

For information: We note that reference to Chapter 14 “Infrastructure for Stafford Town” is actually a reference to Chapter 13.

=3=

## Policy Stafford 1 – Stafford Town (page 37)

### further comment:

The main body of our Response again refers to this section, wherein (secondly) we make specific reference to the proposed build of 3,100 houses and the, as yet non-existent, Master Plan for this Strategic Development Location: –

making it difficult to assess the “effectiveness” and “robustness” of a development outline. An outline that is lacking the basic, fundamental and underlying highway infrastructure that must, of necessity, greatly influence the overall shape and layout of the development of the area.

In particular we highlight the vagueness of subparagraph xiii of sub-section headed ‘Infrastructure’ which intimates that a new road “might go somewhere” !!!

We find that this document adds nothing to the one-off, almost throw-away statement regarding “bus priority” proposals (??) - Proposals as yet unseen by the public - along the A34 Stone Road into Stafford.

This later “proposal” definitely **fails** any “robustness test” given that no evidence whatsoever is (publicly at least) forthcoming to endorse this suggestion.

**Page 48, first paragraph:**

*“Highway capacity improvements along the A513 ...”*

Again, we have commented in detail on this point in the main body of this response – but WHAT enhancements, and for HOW MUCH of the A513 ?

All available information to date is extremely vague about the short stretch of the A513 Beaconside from Common Road / Marston Lane to the MOD No. 4 Site – which may / may not be enhanced to the same standard as that proposed opposite Parkside (as part of the recently approved 400 house development there).

There appears to be NO FURTHER ENHANCEMENTS along the remaining 2/3rds of the A513 Beaconside Road (all the way to the A518 Weston Road).

**Page 60, Stafford east Concept Diagram:**

*Proposed new road*

As we have commented, at length, within the main body of this response, this clearly is a short - an extremely short - stretch of road **“going nowhere” !!** Opening onto an extremely narrow “country lane” that in turn leads to three very narrow, difficult to traverse, road bridges, plus a railway bridge, leading to a residential estate road (Baswich Lane) that already has traffic in excess of its capacity to cope.

**Policy E4 – Economy –**

**Raleigh Hall & Ladfordfields - Recognised Industrial Estates**

Described in **paragraph 9.16:**

*“Both locations have good transport links to Stafford ...”*

Unfortunately the majority of this traffic bound for Stafford and the M6 is funnelled along the A5103 and through Creswell Gove – a narrow, single carriageway, residential road – which is already carrying in excess of 10,000 vehicle movements per 24 hours ... one of the busiest roads into Stafford.

This is already having a detrimental environmental impact and seriously affecting the quality of life for local residents along this ‘ribbon housing development’ ... and which is (currently) the residential heart of Creswell Parish.

We cannot see that any consideration has been given to the impact of (the growth of) these RIEs on the surrounding rural communities and the small villages through which their traffic must inevitably pass.



## Paragraph 10.5

Whilst this Parish Council, along with many others, would wholly endorse the sentiments expressed herein, we can find little of proven, robust, substance to endorse or underwrite these “fine words”.

The local transportation network is not just “important” but **vital** to the day to day access requirements of the people of Stafford town and of Stafford Borough as a whole. It is also extremely congested at the present time and will struggle – and ultimately (indeed very quickly) fail - to cope with the transportation demands of the massive developments proposed for the north of the town.

Prime Point 14 / ProLogis Park – and possibly a significant section of the new Redhill Employment Park – are occupied by 24x7 Logistics Companies for whom swift, reliable and timely access to/from their depots is vital.

Not all traffic heads straight for the M6 – much heads north along the A34 or East along the A513 heading for the A50 (leading to the M1) and beyond.

The bland statement that:

*Highway construction and access improvement will be necessary to cope with the proposed growth increases ...”*

whilst true, needs to be backed by strong, visible, defined strategic plans – plans that must be put in place before development begins. Only then can those plans be regarded as “justified”, “effective” and “robust” ... otherwise it is just guess work, presumption and, even worse **assumption** ... and we all know what “assumption” does – makes an ASS of U and ME.

WHERE IS THE STRATEGY that can enable “effective” Development Planning, on the scale proposed to take place, deliver “effectively” outcomes and be to the benefit of, and without enormous harm to, the existing local communities and infrastructure ???

Paragraphs 10.6 through 10.9 endorse the need but lack the substance of any real, strategic or **actual** proposals or provision.

**These matters have to be determined up front – afterwards is simply too late.**

**Otherwise the damage will have been done, the buildings and houses built ... and then, oh dear, we find have a problem !!!**

## Policy 11 – Infrastructure Development Policy

This is on the back of the **Infrastructure Deliver Plan ...** which is based on a presumption of 2,000 houses to the north of Stafford **and NOT** 3,100 new houses now being proposed.

As an Evidence Base it is **50% understated and therefore WHOLLY INACCURATE, inappropriate and FAILS** to provide the robust evidence base this Local Plan needs.

Therefore when, in **paragraph 13.3**, the Plan states that this IDP has been drawn up to:

*“determine the infrastructure requirements to support the delivery of the ‘Plan for Stafford Borough.’*

it clearly **FAILS**.

**The evidence base is fatally flawed.**

It must therefore draw into question the assertion, in **paragraph 13.21**, that *“the viability of development proposed in this Plan, particularly of the Strategic Development Locations – and specifically this to the north of Stafford town - has been assessed throughout the preparation of the Plan.”*

The Plan has moved on significantly, but the IDP has not caught up. It is now hopelessly, dangerously, out of date as far as the north end of Stafford is concerned – and the impact of developments of the scale now envisaged here may also have significant impact further afield – throughout the whole urban area and, indeed, to the rural areas beyond.

We simply do not have a plan – for the north Stafford – that is based upon “robust evidence” and so clearly **FAILS** the “justification” test in this important regard.

Its “deliverability” is therefore in question - and how can these out-dated matters be monitored when there is no firm evidence base upon which to assess its proposals, let alone its outcomes – and therefore the Plan as it currently exists cannot be assessed as “Effective”.

The “*viability*” is simply not there to be judged.

### **Appendix conclusion**

It is therefore the firm view of Creswell Parish Council therefore that much, much more needs to be brought forward, discussed and debated before the Local Plan – supported by any viable Northern Area Master Plan – is in any way “fit for purpose” and can be seen as robustly “deliverable” ... and be able to withstand public examination and scrutiny at any upcoming Examination in Public.

### **Next steps**

The Parish Council wishes to be kept fully informed of progress and, specifically, to be informed as/when the Plan for Stafford Borough DPD has been submitted to the Secretary of State for Independent Examination – an examination at which the Parish Council will almost certainly seek to be represented.

Yours sincerely,

**L. Horritt.**

Lisa Horritt (Mrs), Clerk to Creswell Parish Council

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Creswell Parish Council (Mrs Lisa Horritt)
Comment ID	PS151
Response Date	25/02/13 15:02
Consultation Point	1.1 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Effective

**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.**

With specific reference to proposed developments alongside Beaconside: whilst the Plan "directs where new development will take place" and begins to "describe what changes will occur" it **fails**, in the absence of highway infrastructure detail to adequately identify "how places will be shaped in the future." Simply saying that more site-specific detail will follow is not sufficient to render this strategic document "effective" or underpin its "deliverability." The provision of such area-wide and fundamental infrastructure supersedes individual site-specific detail - and only when this higher level detail is known can the "effective" nature of these proposals be judged

*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

**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**

To discuss th issuesd raised and the lack of pre-defined infrastructure.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Creswell Parish Council (Mrs Lisa Horritt)
Comment ID	PS152
Response Date	25/02/13 15:07
Consultation Point	1.2 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Consistent with national policy

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

A "vision" without the underlying infrastructure that will, by its very nature, define the area it supports cannot claim to have effective "place-shaping objectives". Likewise this omission makes it extremely difficult to assess the "effectiveness" (delivery) or "justification" (without this base information and the clear evidence to support the chosen option(s)) and so **confounds attempts to assess whether these unspecified decisions would be "consistent" with NNPF requirements:** -

. " to ensure development meets local needs ... whilst protecting and enhancing the existing high quality of life in the Borough."

Since failure to properly meet these "local needs" (now and post developments) may very well diminish, rather than protect and enhance, the existing quality of life ... increased traffic congestion, queuing / standing traffic with all its associated exhaust fume pollution, etc. And yet, **Paragraph 1.13** states that this document " contains the development strategy, policies on how to deliver the Local Plan's vision ... which, in this vital regard, we consider that **it does not** .

**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.**

A defined and effective Area Master Plan / other defined policies that will deliver the required highway infrastructure prior to these major developments taking place - and which will define the area(s) concerned.

*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

**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**

To contribute to the debate on the issues raised.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Creswell Parish Council (Mrs Lisa Horritt)
Comment ID	PS153
Response Date	25/02/13 15:10
Consultation Point	1.3 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

*We don not consider that this paragraph " contains the development strategy, policies on how to deliver the Local Plan's vision.*

**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.**

Need the missing, detailed strategy(ies) that will provide that delivery of Vision.



*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

**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**

To contribute to the debate on the issues raised.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Creswell Parish Council (Mrs Lisa Horritt)
Comment ID	PS154
Response Date	25/02/13 15:15
Consultation Point	2.25 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Justified

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

This proposed local Plan makes considerable incursions into the "unspoilt countryside" to the north of the town - an incursion that could be made even worse by the potential of a new highway infrastructure, as per Policy2, sub-section xiii " *around the perimeter* i.e. to the north *of the site* ..." There may, in the event be no objection to such a new highway - but the Plan is totally non-specific and therefore, as Consultees and local residents, we simply do not know.

**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.**

Hard evidence of highway infrastructure proposals to enable a clear assessment of the impact upon "unspoilt countryside" ... completely dependent on the route(s) proposed.

*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

**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**

To contribute to the debate on the issues raised, in the absence of any clear Highway provision policy(ies) for the area.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Creswell Parish Council (Mrs Lisa Horritt)
Comment ID	PS155
Response Date	25/02/13 15:18
Consultation Point	3.3 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Justified  
. Effective

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

"sustainable development ... balance ... future generations ..." cannot be permitted to include a situation whereby existing roads are even more congested than they are now, rendering quick, effective and efficient access impossible or at the very least intolerable. To suggest that the existing, congested roads can cope with all demands imposed upon it for the next 18 years, whilst contemplating creating a 5% growth in the residential population of the Borough in this one condensed location cannot be "justified" or sustained as an "effective" strategy.

**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.**

A proper, detailed highway infrastructure strategy for the area.

*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

**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**

To contribute to the debate on the issues raised.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Creswell Parish Council (Mrs Lisa Horritt)
Comment ID	PS156
Response Date	25/02/13 15:21
Consultation Point	3.5 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Justified  
. Effective

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

We do not believe the Plan meets its obligations / requirements with regard to the following: -

- . ... including the provision of **infrastructure**
- . ... **accessible** local services ... for which one does not have to endure excessive, traffic congested journeys
- . **Environment** not polluted by bumper-to-bumper traffic congestion at all peak times and whenever there are problems on any of the surrounding roads - the M6 motorway in particular.

**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.**

Clear, more defined policy(ies).

*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

**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**

To contribute to the debate on the issues raised.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Creswell Parish Council (Mrs Lisa Horritt)
Comment ID	PS157
Response Date	25/02/13 15:23
Consultation Point	3.12 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Justified  
. Effective

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

In the absence of a perceived lack of agreement and progress in talks between Stafford Borough and South Staffordshire District Council what realistic hope is there for the EDR (Eastern Distributor Road) ever reaching Junction 13 of the M6 ?

*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

**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**

To contribute to the debate on the issues raised.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Creswell Parish Council (Mrs Lisa Horritt)
Comment ID	PS158
Response Date	25/02/13 15:24
Consultation Point	3.13 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

To note that Creswell Parish Council is effectively prevented from being able to prepare and present a Neighbourhood Plan by virtue of majority of the Parish being within a designated 'major strategic development area'.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Creswell Parish Council (Mrs Lisa Horritt)
Comment ID	PS159
Response Date	25/02/13 15:27
Consultation Point	3.15 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Effective

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

**Paragraph 3.15 / 3.16 /3.17** o Provision for local communities o The need for new infrastructure improvements o Delivery of key infrastructure ... and high on everyone's agenda is "more roads" - including an Eastern Distributor Road to provide a through-route and bypass for Stafford town centre - and yet this 18 year strategic Plans throws no effective light (or hope) on these matters. Local communities here at the north end of Stafford suffer frequent holdups and road blockages the moment anything untoward occurs anywhere on the M6 from Junction 12 in the south to Junction 16 in the north. The vast majority of this traffic is forced along the A34, through the centre of town - for which the only practical, available route is along Queensway and so the entire town centre 'locks up' at a huge cost to local businesses. Despite the imminent construction of two new supermarkets (Morrisons and the new Marks & Spencer complex) there is no relief offered for such circumstances. NOT an "effective" way forward.

**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.**

A Local Plan - with Policies - that includes, within the next 18 years, more than just 3/4 mile "Phase 1" !! of the EDR (Eastern Distributor 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?** 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**

To contribute to the debate on the issues raised.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Creswell Parish Council (Mrs Lisa Horritt)
Comment ID	PS160
Response Date	25/02/13 15:28
Consultation Point	3.16 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

See comments filed above re: -**Paragraph 3.15 / 3.16 /3.17** o Provision for local communities o The need for new infrastructure improvements o Delivery of key infrastructure

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Creswell Parish Council (Mrs Lisa Horritt)
Comment ID	PS161
Response Date	25/02/13 15:29
Consultation Point	3.17 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Effective

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

See coomenst filed above, under 31.5 re: -**Paragraph 3.15 / 3.16 /3.17** o Provision for local communities  
o The need for new infrastructure improvements o Delivery of key infrastructure

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Creswell Parish Council (Mrs Lisa Horritt)
Comment ID	PS162
Response Date	25/02/13 15:31
Consultation Point	3.20 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

**Paragraph 3.20 Outcome 2:** Can this Plan really put forward Stafford as an "aspirational place to live" if the daily journey to work is so fraught with difficulty ... when it can , in the present day , take anything in excess of 20 minutes for the 2-mile journey across town - be that by private car or by public transport. And when employees find it quicker to commute 15 miles into Stafford from other conurbations and local villages rather than face what is frequently a 50-minute commute from one side of Stafford to their workplace on the other side of town. **Congestion is the big problem Stafford has to get to grips with ... and it can / will only get worse with such major new developments in the pipeline.** **Paragraph 5.1 Spatial vision (f) (f)** ... convenient sustainable connections from / to new developments **(i)** new ... developments supported by ... new infrastructure provision In terms of enhanced and improved highway capacity - and the daily commute will always exist even if only "from one side of town to the other" - we simply do not see any strategic solutions outlined in this Local Plan ... and 18 years is a long time to (a) get things wrong and then (b) struggle to put things right retrospectively.



**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.**

Some hope for the future of local traffic movement in / around / through Stafford urban area.

*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

**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**

To contribute to the debate on the issues raised.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Creswell Parish Council (Mrs Lisa Horritt)
Comment ID	PS163
Response Date	25/02/13 15:34
Consultation Point	5.1 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

**Paragraph 5.1 Spatial vision (f) (f)** ... convenient sustainable connections from / to new developments  
**(i)** new ... developments supported by ... new infrastructure provision In terms of enhanced and improved highway capacity - and the daily commute will always exist even if only "from one side of town to the other" - we simply do not see any strategic solutions outlined in this Local Plan ... and 18 years is a long time to (a) get things wrong and then (b) struggle to put things right retrospectively.

As things stand: NON DELIVERABLE.

**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.**

A deliverable outcome in a realistic timeframe (within the life of this Plan).

*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

**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**

To contribute to the debate on the issues raised.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Creswell Parish Council (Mrs Lisa Horritt)
Comment ID	PS164
Response Date	25/02/13 15:39
Consultation Point	1 SPATIAL PRINCIPLE 1 (SP1) - PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

- . Effective
- . Consistent with national policy

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

**SPATIAL PRINCIPLE 1** says the right words in seeking to " *improve the economical, social and environmental conditions in the area*" but, as the local Parish Council, we struggle to see how / where / when these fine words manifest themselves into reality and into practical, upfront provision. If this were truly a "plan-led" Strategic Document then we might have (slightly) more confidence but, having initially identified areas and strategic development sites, too much is then left to become "developer led" ... the most obvious example of which is handing the preparation of the Area Master Plans over to the development consortia to see what they come up with / what they will offer ... which in any commercial, finance-driven world, will (we fear) be as little as possible - the minimum that can be got away with. At the risk of repeating ourselves, we see no strategic "delivery plan" for our area.

**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.**

A defined strategic "delivery plan" for our area.

*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

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

To contribute to the debate on the issues raised.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Creswell Parish Council (Mrs Lisa Horritt)
Comment ID	PS165
Response Date	25/02/13 15:42
Consultation Point	6.23 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

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

Paragraph 6.23 talks about "... growth .. together with new transport and social infrastructure ..." such that Stafford continues "to be a vibrant and active community" but we struggle to see those fine words translated into action points within the detail of the proposals put forward in The Plan to date. Consequently our fear is that our local community(ies) will be strangled by inadequate and increasingly congested roads and therefore that these otherwise exciting new developments will become a curse rather than a blessing. We wish to see proactive, advance planning and not have to face the long-winded, uphill struggle for retrospective fixing of problems generated by such large scale developments. We would wish to support the principles of: **SPATIAL PRINCIPLE 7 (SP7) - Supporting the location of new development: - (e)** that these are " *the most sustainable in terms of impact on existing infrastructure, or demonstrate that infrastructure can be provided to address development issues* " in ways that will: **(k)** " *ensure adequate vehicular, pedestrian and cycle access as well as*

*cycle and short-stay parking facilities on the site; and (I) that" will not adversely affect the residential amenity of the locality."* But we then struggle to find anything else, anywhere else in the document to provide concrete evidence / assurance that these things will happen. We would cite, as a current example, the new Redhill Employment site which included in its Application Justification that a Park & Ride facility would ("could") be incorporated within the site but find nothing since to afford us any confidence that such a facility will ever actually come to fruition - an "aspiration" that is more than likely to 'wither on the vine'. Likewise any (future) provision for overnight HGV parking ... and yet we already suffer the congestion, environmental damage and pollution of excessive and unwarranted overnight HGV parking on Prime Point 14 / ProLogis Park that is damaging pavements, kerb stones, grassed areas and generally blighting the area on a daily basis. Something that, as it stands, the Redhill Employment Park will only exacerbate. WHY? Because there is no actual, concrete, Borough-led (or County-led) Strategy or Policy to do anything about it ... instead just classic developer-led plans that simply ignore local needs and duck local problems, even when they themselves are the inherent cause of those problems. Once bitten, twice shy ... and Creswell Parish Council and local residents have been bitten more than once !! Which is why, in an 18-year Local Plan Strategy document, we are looking for such assurances ... but failing to find them.

**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.**

We would wish to see proactive, advance planning and not have to face the long-winded, uphill struggle for retrospective fixing of problems generated by such large scale developments.

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

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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

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

To contribute to the debate on the issues raised.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Creswell Parish Council (Mrs Lisa Horritt)
Comment ID	PS166
Response Date	25/02/13 15:45
Consultation Point	6.64 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Justified  
. Effective

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

We would wish to support the principles of: **SPATIAL PRINCIPLE 7 (SP7) - Supporting the location of new development:** - (e) that these are " *the most sustainable in terms of impact on existing infrastructure, or demonstrate that infrastructure can be provided to address development issues* " in ways that will: (k) " *ensure adequate vehicular, pedestrian and cycle access as well as cycle and short-stay parking facilities on the site; and (l) that* " *will not adversely affect the residential amenity of the locality.*" **But** we then struggle to find anything else, anywhere else in the document to provide concrete evidence / assurance that these things will happen. We would cite, as a current example, the new Redhill Employment site which included in its Application Justification that a Park & Ride facility would ("could") be incorporated within the site but find nothing since to afford us any confidence that such a facility will ever actually come to fruition - an "aspiration" that is more than likely to 'wither on the vine'. Likewise any (future) provision for overnight HGV parking ... and yet we already suffer the congestion, environmental damage and pollution of excessive and unwarranted overnight HGV



parking on Prime Point 14 / ProLogis Park that is damaging pavements, kerb stones, grassed areas and generally blighting the area on a daily basis. Something that, as it stands, the Redhill Employment Park will only exacerbate. WHY? Because there is no actual, concrete, Borough-led (or County-led) Strategy or Policy to do anything about it ... instead just classic developer-led plans that simply ignore local needs and duck local problems, even when they themselves are the inherent cause of those problems. Once bitten, twice shy ... and Creswell Parish Council and local residents have been bitten more than once !! Which is why, in an 18-year Local Plan Strategy document, we are looking for such assurances ... but failing to find them.

**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.**

Concrete evidence / assurance that these things will happen.

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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

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

To contribute to the debate on the issues raised.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Creswell Parish Council (Mrs Lisa Horritt)
Comment ID	PS167
Response Date	25/02/13 15:53
Consultation Point	8 POLICY STAFFORD 1 ? STAFFORD TOWN ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Justified  
. Effective

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

1:

The main body of our Response refers to this section, wherein (firstly) we make specific reference to the Northern Access Improvement Scheme (as per 'Housing' sub. Paragraph (a)) and what is now referred to as Phase 1 of the Eastern Distributor Road (aka the Eastern Access Improvement Scheme - Housing, sub. Paragraph (c)). Further noting - with regard to Infrastructure (road) provision i.e. the limited Northern Access Improvements (aka enhancements to Redhill Island) and the absence of any enhancements at all to the western 2/3rds of Beaconside Road (A513) - that we do not consider these provisions come anywhere close to providing an integrated solution that, in any way, forms a viable EDR ... Phase 1 or otherwise. 2:

The main body of our Response again refers to this section, wherein (secondly) we make specific reference to the proposed build of 3,100 houses and the, as yet non-existent, Master Plan for this Strategic Development Location: -

making it difficult to assess the "effectiveness" and "robustness" of a development outline. An outline that is lacking the basic, fundamental and underlying highway infrastructure that must, of necessity, greatly influence the overall shape and layout of the development of the area. In particular we highlight the vagueness of subparagraph xiii of sub-section headed 'Infrastructure' which intimates that a new road "might go somewhere" !!! We find that this document adds nothing to the one-off, almost throw-away statement regarding "bus priority" proposals (??) - Proposals as yet unseen by the public - along the A34 Stone Road into Stafford. This later "proposal" definitely **fails** any "robustness test" given that no evidence whatsoever is (publicly at least) forthcoming to endorse this suggestion. **Page 48, first paragraph (part of paragraph 7.27):** " *Highway capacity improvements along the A513 ...*" Again, we have commented in detail on this point in the main body of this response - but WHAT enhancements, and for HOW MUCH of the A513 ? All available information to date is extremely vague about the short stretch of the A513 Beaconside from Common Road / Marston Lane to the MOD No. 4 Site - which may / may not be enhanced to the same standard as that proposed opposite Parkside (as part of the recently approved 400 house development there). There appears to be NO FURTHER ENHANCEMENTS along the remaining 2/3rds of the A513 Beaconside Road (all the way to the A518 Weston Road). **Page 60, Stafford east Concept Diagram:** *Proposed new road* As we have commented, at length, within the main body of this response, this clearly is a short - an extremely short - stretch of road " **going nowhere** " !! Opening onto an extremely narrow "country lane" that in turn leads to three very narrow, difficult to traverse, road bridges, plus a railway bridge, leading to a residential estate road (Baswich Lane) that already has traffic in excess of its capacity to cope.

**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.**

A genuine integrated transport scheme for the whole area - supported by up-to-date and robust evidence.

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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

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

To contribute to the debate on the issues raised.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	J Ross Developments (Mr Nick Scott)
Comment ID	PS168
Response Date	25/02/13 15:55
Consultation Point	4.1 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Effective

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

#### Adapting to Local Demographic Change

This is of course a national matter with implications at the local level. Agreed that this is a key and pressing issue, and it is the case that more effective and suitable accommodation for the elderly will free up other housing much of which will be appropriate for families.

Unlike affordable housing and the 'pepperpot principle' of avoiding concentrations of particular housing types, there is much to be gained from grouping this kind of housing in order that facilities can be shared and that if necessary a transition to care facilities can be provided with minimal disruption. In order to achieve this will it be necessary to safeguard sites?

#### Maximising Access to Services

The trend towards centralising services and facilities will continue. Shops in particular will require larger catchment populations to remain viable due to leakage to other centres (superstores and out-of-centre retail parks) as well as the rising effect of internet based shopping which is likely to impact on rural communities as they are generally more remote from shops. It is therefore important to recognise thresholds that should be achieved particularly in the Key Settlements in order to provide long term safeguards to local shops and services. These centres are likely to have to provide these services over a wider catchment as shops and services in the smaller villages are likely to continue to contract owing to the factors described above.

**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.**

Further information required as to how these challenges will be addressed in practice.

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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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Creswell Parish Council (Mrs Lisa Horritt)
Comment ID	PS169
Response Date	25/02/13 15:57
Consultation Point	7.36 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Justified  
. Effective

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

*Proposed new road* As we have commented, at length, within the main body of this response, this clearly is a short - an extremely short - stretch of road " **going nowhere**" !! Opening onto an extremely narrow "country lane" that in turn leads to three very narrow, difficult to traverse, road bridges, plus a railway bridge, leading to a residential estate road (Baswich Lane) that already has traffic in excess of its capacity to cope.

*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

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

To contribute to the debate on the issues raised.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Creswell Parish Council (Mrs Lisa Horritt)
Comment ID	PS170
Response Date	25/02/13 15:59
Consultation Point	9.16 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Justified

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

**Raleigh Hall & Ladfordfields - Recognised Industrial Estates** Described in **paragraph 9.16** : "*Both locations have good transport links to Stafford ...*" Unfortunately the majority of this traffic bound for Stafford and the M6 is funnelled along the A5103 and through Creswell Gove - a narrow, single carriageway, residential road - which is already carrying in excessive of 10,000 vehicle movements per 24 hours ... one of the busiest roads into Stafford. This is already having a detrimental environmental impact and seriously affecting the quality of life for local residents along this 'ribbon housing development' ... and which is (currently) the residential heart of Creswell Parish. We cannot see that any consideration has been given to the impact of (the growth of) these RIEs on the surrounding rural communities and the small villages through which their traffic must inevitably pass.



**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.**

Proper and due consideration has been given to the impact of (the growth of) these RIEs on the surrounding rural communities and the small villages through which their traffic must inevitably pass.

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

To contribute to the debate on the issues raised.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Creswell Parish Council (Mrs Lisa Horritt)
Comment ID	PS171
Response Date	25/02/13 16:02
Consultation Point	10.5 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Justified  
. Effective

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

Whilst this Parish Council, along with many others, would wholly endorse the sentiments expressed herein, we can find little of proven, robust, substance to endorse or underwrite these "fine words". The local transportation network is not just "important" but **vital** to the day to day access requirements of the people of Stafford town and of Stafford Borough as a whole. It is also extremely congested at the present time and will struggle - and ultimately (indeed very quickly) fail - to cope with the transportation demands of the massive developments proposed for the north of the town. Prime Point 14 / ProLogis Park - and possibly a significant section of the new Redhill Employment Park - are occupied by 24x7 Logistics Companies for whom swift, reliable and timely access to/from their depots is vital. Not all traffic heads straight for the M6 - much heads north along the A34 or East along the A513 heading for the A50 (leading to the M1) and beyond. The bland statement that:

. *Highway construction and access improvement will be necessary to cope with the proposed growth increases ..."*

whilst true, needs to be backed by strong, visible, defined strategic plans - plans that must be put in place before development begins. Only then can those plans be regarded as "justified", "effective" and "robust" ... otherwise it is just guess work, presumption and, even worse **assumption** ... and we all know what "assumption" does - makes an ASS of U and ME. WHERE IS THE STRATEGY that can enable "effective" Development Planning, on the scale proposed to take place, deliver "effectively" outcomes and be to the benefit of, and without enormous harm to, the existing local communities and infrastructure ??? Paragraphs 10.6 through 10.9 endorse the need but lack the substance of any real, strategic or **actual** proposals or provision. **These matters have to be determined up front - afterwards is simply too late. Otherwise the damage will have been done, the buildings and houses built ... and then, oh dear, we find have a problem !!!**

**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.**

A Strategy that can deliver "effectively" outcomes and be to the benefit of, and without enormous harm to, the existing local communities and infrastructure.

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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

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To contribute to the debate on the issues raised.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Creswell Parish Council (Mrs Lisa Horritt)
Comment ID	PS172
Response Date	25/02/13 16:09
Consultation Point	40 Policy I1 ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Justified

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

This is on the back of the **Infrastructure Deliver Plan ...** which is based on a presumption of 2,000 houses to the north of Stafford **and NOT** 3,100 new houses now being proposed. As an Evidence Base it is **50% understated and therefore WHOLLY INACCURATE, inappropriate and FAILS to provide the robust evidence base this Local Plan needs.** Therefore when, in **paragraph 13.3**, the Plan states that this IDP has been drawn up to:

*" determine the infrastructure requirements to support the delivery of the ?Plan for Stafford Borough."*

it clearly **FAILS. The evidence base is fatally flawed.** It must therefore draw into question the assertion, in **paragraph 13.21**, that *" the viability of development proposed in this Plan, particularly of the Strategic Development Locations - and specifically this to the north of Stafford town - has been assessed throughout the preparation of the Plan."* The Plan has moved on significantly, but the IDP has not caught up. It is now hopelessly, dangerously, out of date as far as the north end of Stafford is concerned

- and the impact of developments of the scale now envisaged here may also have significant impact further afield - throughout the whole urban area and, indeed, to the rural areas beyond. We simply do not have a plan - for the north Stafford - that is based upon "robust evidence" and so clearly **FAILS** the "justification" test in this important regard. Its "deliverability" is therefore in question - and how can these out-dated matters be monitored when there is no firm evidence base upon which to assess its proposals, let alone its outcomes - and therefore the Plan as it currently exists cannot be assessed as "Effective". The " *viability* " is simply not there to be judged.

**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.**

An up-to-date Infrastructure Delivery Plan ... and one that has been subject to proper public consultation and debate - THEN, and only then, will we be in a position to assess the evidence base and robustness / deliverability of this Plan

*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

**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**

To contribute to the debate on the issues raised.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Creswell Parish Council (Mrs Lisa Horritt)
Comment ID	PS173
Response Date	25/02/13 16:12
Consultation Point	13.3 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

- . Positively prepared
- . Justified
- . Effective

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

This **Infrastructure Deliver Plan** is based on a presumption of 2,000 houses to the north of Stafford and **NOT** 3,100 new houses now being proposed. As an Evidence Base it is **50% understated and therefore WHOLLY INACCURATE, inappropriate and FAILS to provide the robust evidence base this Local Plan needs.** Therefore when the Plan states that this IDP has been drawn up to:

. " *determine the infrastructure requirements to support the delivery of the ?Plan for Stafford Borough.*'

it clearly **FAILS. The evidence base is fatally flawed.**

*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

**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**

To contribute to the debate on the issues raised.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Creswell Parish Council (Mrs Lisa Horritt)
Comment ID	PS174
Response Date	25/02/13 16:15
Consultation Point	13.21 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Justified

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

The assertion made herein are incorrect. The evidence base is flawed. The Plan has moved on significantly, but the IDP has not caught up. It is now hopelessly, dangerously, out of date as far as the north end of Stafford is concerned - and the impact of developments of the scale now envisaged here may also have significant impact further afield - throughout the whole urban area and, indeed, to the rural areas beyond. 3,100 new houses now being proposed and NOT the 2,000 upon which the IDP was predicated.

See earlier comments re. Policy 11.

*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

**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**

To contribute to the debate on the issues raised.



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

**Representations Form**

Ref:

**(For official  
use only)**

**Please return completed forms to:**

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

**Responses must be received by 12 noon on Thursday 28<sup>th</sup> February 2013**

**This form has two parts:**

**Part A:** Personal Details

**Part B:** Your representations.

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

# Part A

## I. Personal Details\*

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

## 2. Agent's Details (if applicable)

Title	MR	
First Name	ANDREW	
Last Name	BARNETT	
Job Title (if applicable)		
Organisation (if applicable)	A G & H BARNETT & SON	
Address Line 1	STONE PARK FARM	
Address Line 2	PINGLE LANE	
Address Line 3	STONE	
Address Line 4	STAFFORDSHIRE	
Postcode	ST15 8QT	
Telephone Number	07973 480 006	
E-mail address	andrewbarnett69@hotmail.co.uk	

## Part B – Please use a separate sheet for each representation

Name or Organisation	A G & H BARNETT & SON
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**3. What part of The Plan for Stafford Borough (including the Policies Maps document) does your comment relate to?**

e.g. Policy Reference, Paragraph, Map title	POLICY STONE 1 – STONE TOWN: HOUSING [POLICY STONE 2 – WEST & SOUTH OF STONE] [Stone Town Key Diagram, Policies Map and Stone Concept Diagram]
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*If your comment does not relate to a specific part of the document, or it relates to a different document, for example the Sustainability Appraisal, please make this clear in your response.*

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

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

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

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

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

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

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

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

Under Policy Stone 1 – Stone Town, it is proposed to direct the majority of housing to a single Strategic Development Location to the west of the town's existing development boundary.

It is considered that the adoption of just a single Strategic Development Location for housing poses a significant risk to the effective implementation of the Plan in the event, for example, delivery of that site is delayed or is for some reason not possible. As a consequence the Plan is not considered to be effective.

It is considered that two Strategic Development Locations for Housing should be identified and adopted

which would spread any such risks.

Further consideration should therefore be given to the inclusion of Site SN-I, immediately to the east of Stone as a Strategic Development Location for Housing given that it performs well in relation to other wider environmental and sustainability criteria such proximity to the town centre, location within Flood Risk Zone I, distance from Heritage Assets, distance from protected nature conservation habitats etc.

It is noted that Site SN-I has not been taken forward, for the reasons cited within Sections 3.2 and 4.2 of the Stafford Borough Infrastructure Strategy Stage I Final Report.

Site SN-I has essentially been discounted in the Report as it:

*' would require a new bridge over the WCML railway line, which would be technically difficult, time consuming and costly as construction work would only be possible at holiday periods , the specification is likely to be high and there are a limited number of appropriate contractors. Access across the railway is also likely to be subject to Network Rail, which may be regarded as a ransom payment.'*; and

*'is not considered deliverable in the short or medium-term, due to the extensive enabling works that would be required to access the site via a new bridge across the WCML, as well as significant improvements to the local highway network.'*

Given the Government's proposals for HS2 and the 'technical difficulties' that will entail, the replacement of a bridge over the railway line cannot be viewed as an overriding constraint. Indeed, were that to be the case then it would have been deemed not to be deliverable at all, rather than in the 'short to medium-term'.

Ample timescale would be available within the timeframe of the Plan to implement the necessary improvements, particularly given that the delivery of Strategic Development Location(s) at Stone would in any event be deferred until after 2021 (Policy Stone I Housing iii.).

The availability of only a limited number of appropriate contractors should not be treated as an overriding constraint. Were that the case, then the need for and provision of new electricity supplies to any development should similarly be treated as an overriding constraint.

The likelihood of a high specification of the bridge is cited as a constraint and yet no costings are provided within the evidence base to demonstrate whether this would in fact be an overriding constraint on the development of Site SN-I.

Similarly, reference is made to likelihood of Network rail seeking a ransom payment. The evidence base does not however indicate whether Network Rail would in fact seek a ransom payment or if they were to, then what level of payment would be sought. Indeed, there is no indication that Network Rail has even been contacted in relation to principle, feasibility or cost.

In light of the above it is considered that the evidence base is not sufficiently robust and that the Plan is unsound on the basis that it is not sufficiently effective or justified.

(attach separate sheets as necessary)

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

Two Strategic Development Locations should be identified to include Site SN-1 (or part thereof) with housing apportioned between them in the light of more robust feasibility and viability studies.

This should be reflected within the wording of Policy Stone 1 – Stone Town Housing ii which should be amended to read:

*ii. Providing a range of development locations for new homes over the Plan period to 2031 including for affordable housing. This will include new housing development at the Strategic Development Locations east and west of Stone identified on the Policies Map, to be delivered after 2021.'*

Stone Town Key Diagram, Policies Map and Stone Concept Diagram would need to be amended to include Site SN-1 as a 'Proposed Strategic Site' for Housing

Policy Stone 2 – West and South of Stone should be amended to; 'Policy Stone 2 – East, West & South of Stone' and the introductory paragraph amended to read:

*'Within the area East, West and South of Stone identified on the Policies Map a sustainable, well designed mixed use development will be delivered between 2021 and 2031. ...'*

(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**

Not Applicable

(attach separate sheets as necessary)

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

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

## Representation Form Guidance Notes



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

### **Representations should therefore focus on legal compliance and soundness.**

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

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

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

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

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

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

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Hilderstone Parish Council (Mrs Helen Howie)
Comment ID	PS176
Response Date	25/02/13 16:48
Consultation Point	12.22 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Justified

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

Hilderstone Parish Council accepts that the Borough Council is legally obliged to include plans for the provision of renewable sources of energy within the Borough. It feels however, that the proposed plans for renewable energy especially wind power is currently unsound as very little consultation has taken place with Parish Councils and Borough Council tax payers on this matter. Moreover Staffordshire County Council has recently developed its own Wind Energy policy in which it states that it is 'very concerned that large scale wind energy proposals' will be detrimental to a rural environment. Please contact Ian Benson at Staffordshire County Council for more information. Hilderstone Parish Council would oppose any application for the development of large wind turbines in or near to the Parish.



**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.**

Liaise with Staffordshire County Council and carry out more public consultation on this matter.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	J Ross Developments (Mr Nick Scott)
Comment ID	PS177
Response Date	25/02/13 17:33
Consultation Point	5.1 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

Our primary interest is in Eccleshall. We support the Spatial Vision with the exception of the qualification at q. that development in the Borough's villages will provide for 'local needs'. The Key Rural Settlements have a role in contributing towards the Borough's needs and this is recognised elsewhere in the Plan. In Eccleshall's case, 'local' must mean catering for the needs of the rural hinterland and the north-east of the Borough. As with Stone, there is some degree of pressure from the Potteries which must be taken account of, These larger villages have contributed a significant amount towards the Borough's recent growth and are intended to absorb 12% of the growth going forward. This is beyond any purely locally derived need in its strictest sense.

There may be a case for restricting development in the lower order villages to meeting local needs in terms of affordable housing, rural workers housing and towards meeting a clearly identifiable local need but this should not be applied to the Key Settlements where growth is required to underpin the strategic provision of services and housetypes including specialist housing for the elderly.

**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.**

There should be a distinction made between housing in Key Settlements and the other villages and 'local need' should be defined.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	J Ross Developments (Mr Nick Scott)
Comment ID	PS178
Response Date	25/02/13 17:49
Consultation Point	5.2 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

We support in principle Key Objectives 21, 22, 24 and 25.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Cannock Chase AONB Partnership ( Ruth Hytch)
Comment ID	PS179
Response Date	25/02/13 15:20
Consultation Point	37 Policy N7 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Consistent with national policy

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

The analytical and descriptive sections of the Plan are strong with reference to identifying the guidance in the NPPF on AONBs and in recognising the importance of the (landscape and scenic beauty of) Cannock Chase AONB to the landscape of Stafford Borough. The plan also considers the importance is the SSSI and SAC areas on the AONB in depth and with rigour. The SAC Policy (N6) is appropriately strongly worded and restrictive but, it is concerned with habitat rather than landscape. However, there is concern related to "Soundness" in terms of the compliance of the Local plan with the short but specific reference to AONBs in the NPPF (section 11, para. 115), which states; "*Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty The conservation of wildlife and cultural heritage are important considerations in all these areas...*" Discussion with the officers has confirmed that the new Local Plan will replace the adopted 2001 Plan and that N7 will therefore replace the existing AONB Policy (E&D31) and that it is

not intended to save that policy. It is also noted that the Structure Plan, which also contains an AONB policy, is likely to be set aside sometime during 2013. In addition, the Planning Officer confirmed that the Site Specific Allocations Document, which is to be prepared after the current document and will form part of the Local Plan, will not include any further specific policies on the AONB. Therefore, the new Policy N7 will become the only policy that specifically refers to the whole of the area of the AONB which is in Stafford Borough. The old (existing) AONB Policy (E&D31) is worded as follows: *POLICY E&D31 CANNOCK CHASE AONB Proposals within, or likely to affect the Cannock Chase AONB or its setting, will only be allowed where the proposal will enhance the visual, nature conservation and/or historical qualities of the landscape. Development which will have an adverse impact on the character or setting of the Chase, or which would add to urban fringe pressures will not be granted planning permission. Proposals within or likely to affect the Cannock Chase AONB will be restricted to uses compatible with the conservation of the natural beauty of the area. Proposals for development will be subject to special scrutiny.* In comparison, the new Policy (N7) is more of an enabling, principle based measure and it is worded as follows: *Policy N7 Cannock Chase AONB The conservation and enhancement of the Cannock Chase Area of Outstanding Natural Beauty (AONB) is of primary importance. The principles to be followed in the area are to: a. Conserve and enhance the special landscape character, heritage and distinctiveness of the locality; b. Conserve and enhance important viewpoints, protect the context and safeguard views out of and into the AONB; c. Require appropriate new developments to be suitably located and have regard for existing landscape features and tree screening; d. Support suitably located small, well designed sustainable developments, where it is required to meet the needs of the local community; e. Have regard to the principles set out in the Cannock Chase AONB management plan for managing recreational activities; f. Promote access to the AONB through sustainable forms of transportation, particularly by means other than the car.*

**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.**

In order that it more fully reflects the provisions of the NPPF, reflecting the importance attached to landscape and scenic beauty, the following amendments ( **see bold type** ) to Policy N7 are suggested: *Policy N7 Cannock Chase AONB The conservation and enhancement **of the landscape and scenic beauty** of the Cannock Chase Area of Outstanding Natural Beauty (AONB) is of primary importance. The principles to be followed in the area are to: a - f as written... **g. Therefore, any proposals for new development (including changes of use) within , or likely to adversely affect the landscape and scenic beauty of Cannock Chase AONB or its setting, will only be allowed where the proposal will enhance the visual, nature conservation and/or historical qualities of the landscape. h. Proposals within or likely to affect the Cannock Chase AONB will be restricted to uses compatible with the conservation of the landscape and scenic beauty of the area. Proposals for development will be subject to special scrutiny.*** The use of this wording, derived from the existing policy and the NPPF, will help to ensure continuity, reflecting the long term nature of the protection of the AONB since designation in 1958. In addition, the revised policy wording will more fully reflect the descriptive and analytical sections of the plan (at paras. 12.40 to 12.43) which precede policy N7 and are worded as follows: **12.40** *The Cannock Chase AONB is one of 47 designated AONBs in the UK. It was designated as an AONB in 1958, and is considered to be one of the most vulnerable, due to its proximity to large adjoining conurbations and the rich array of mineral resources located under it. It is composed of 68 square kilometres of high sandstone heathlands and pine plantations that are fringed by historic parklands and enclosed by farmlands. A substantial part of the heathlands in the AONB have been designated as a Site of Special Scientific Interest (SSSI), as a measure of their importance in providing nesting and feeding grounds for a rich array of interesting and rare species of plants and animals.* **12.41** *The Cannock Chase AONB is predominantly used for recreational activities by approximately 1.27 million visitors annually through activities such as walking, cycling and horse riding due to the excellent accessibility via its network of public footpaths, bridleways and permissive trails, which stretch for over 500km. Both the Trent and Mersey canal and the Staffordshire and Worcestershire canal run through the Cannock Chase AONB, with a canal junction at Great Haywood.* **12.42** *Government policy stated in the NPPF affords nationally designated areas such as the Cannock Chase AONB the highest status of protection in relation to landscape and scenic beauty . The Cannock Chase AONB provides a valuable asset to the residents of Stafford Borough and the adjoining districts of Lichfield, South Staffordshire and Cannock Chase. The Cannock Chase*

AONB also acts as a resource for the development of sustainable tourism, as well as contributing to the quality of life locally. **12.43** The conservation of the natural beauty of the landscape and countryside is managed through the AONB management plan, produced by the Cannock Chase AONB Unit, which provides guidance for the management, preservation and enhancement of the unique qualities of the areas landscape and environment. The management plan is updated at regular intervals and should be taken into consideration in all development proposals that could affect the area.

*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

**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**

Either the Partnership Planning Adviser or I am happy to appear, should the Inspector have any questions about the issues raised and to provide any further information that is required about the AONB. However, if the Inspector and/or the Council consider that an appearance is not necessary, I would be happy for this point to be dealt with through written representations.



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

Ref:

**Representations Form**

**(For official  
use only)**

**Please return completed forms to:**

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

**Responses must be received by 12 noon on Thursday 28<sup>th</sup> February 2013**

**This form has two parts:**

**Part A:** Personal Details

**Part B:** Your representations.

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



# Part A

## I. Personal Details\*

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

## 2. Agent's Details (if applicable)

Title	Mr	
First Name	Robert	
Last Name	Hine	
Job Title (if applicable)		
Organisation (if applicable)	Sustainability Matters in Stafford Borough	
Address Line 1	254 Tixall Road	
Address Line 2	Stafford	
Address Line 3		
Address Line 4		
Postcode	ST16 3UE	
Telephone Number	(01785) 603387	
E-mail address	roberthine@btinternet.com	

## Part B – Please use a separate sheet for each representation

Name or Organisation	Sustainability Matters, Stafford Friends of the Earth and 'Transition Town Stafford'
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**3. What part of The Plan for Stafford Borough (including the Policies Maps document) does your comment relate to?**

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

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

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

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

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

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

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

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

Not applicable

(attach separate sheets as necessary)

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

See attached detailed response

(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

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

To set out in more detail the concerns we have in relation to the plan, particularly in relation to meeting Carbon Targets and protecting the environment.

(attach separate sheets as necessary)

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

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

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

**Representation Form Guidance Notes**



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

**Representations should therefore focus on legal compliance and soundness.**

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

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

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

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

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

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

## STAFFORD PLAN 2031

### Response to Consultation by Sustainability Matters, Stafford Friends of the Earth and 'Transition Town Stafford'

#### Who We Are

**Sustainability Matters in Stafford Borough** was established in 2003 as an umbrella organisation to represent the community in Stafford Borough on issues relating to sustainability and to help create a community in Stafford Borough that is environmentally, socially and economically sustainable and is founded on sound ecological principles

**Stafford Friends of the Earth** is the local group of Friends of Earth. We stand for: a beautiful world, a good life and a positive relationship with the environment. We act together for the planet and everyone who lives on it.

**Transition Town Stafford** is part of a grassroots network of communities that are working to build resilience in response to peak oil, climate destruction, and economic instability.

#### Introduction

We welcome the opportunity to respond to the proposals for the Stafford Development Plan.

There is much in the plan that we support but we feel the agenda is less radical than it could be, notably in many areas of carbon reduction and environmental protection. There is a lack of clear targets and the ambition is too weak to address effectively the challenges that confront us in the next few decades if we are to reduce greenhouse gas emissions and avoid catastrophic climate change. **We set out below why this brings into question both its consistency with national policy and the effectiveness of the plan in terms of delivery and monitoring.**

The plan seeks to promote Stafford Borough as a growth area, but we are also not convinced that the level of growth is justified. We strongly believe it should be considered within the wider context of sustainable development.

We note the plan's context is that the Government changes to the planning system are meant to encourage local rather than topdown national or regional decision making, yet it has been prepared in line with National Planning Policies (notably the NPPF) (Paras 3.1 and 3.2)

We also note the inconsistent use of 'sustainability' sometimes to mean sustainable development and sometimes in a purely economic sense. This risks leading to inconsistency and a bias towards one element of sustainability. The plan should aim to be consistent in its approach to this key concept.

Of all the (at times conflicting) definitions of the term 'sustainable' offered in the document we suggest that the one used as the basis for the whole Plan (and therefore adhered to

throughout) should be that contained in the five guiding principles in the government's 'UK Sustainable Development Strategy - Securing the Future':

- Living within environmental limits
- Ensuring a strong and healthy just society
- Achieving a sustainable economy
- Promoting good governance
- Using sound science responsibly.

This would ensure that the ecological limits, which should shape every other policy, quite rightly come first. **This would help to ensure it is consistent with National Policy and achieves sustainable development goals.**

### **Overall Level of Growth**

The overall level of growth is predicated on Stafford's role as a growth centre. We agree that there is a need to provide adequate housing, employment and retail provision to support the local community. However, we are not convinced that the level of growth envisaged is justified, and therefore whether the plan is justified.

In particular there is a risk that 'growth' of this kind will prevent us from 'Living within environmental limits' and that to ignore this fact is to ignore the sustainability priorities outlined in the guiding principles of the UK Sustainable Development Strategy, which aims to ensure:

'We enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life without compromising the quality of life of future generations' (*Securing the future – delivering UK sustainable development strategy*, March 2005).

This has been endorsed by the Coalition Government. The Defra website says: 'This government wants to mainstream sustainable development so that it is central to the way we make policy, run our buildings and purchase goods and services. In the same way as leading businesses recognise that sustainability is a core strategic issue and not just a "nice to have".' **The overall level of growth needs to be addressed to ensure it meets sustainable development goals and is consistent with National Policy**

### Level of Housing Provision

The Regional Spatial Strategy suggested a need for 11,000 houses up to 2026. The figure being proposed in SP2 from 2011-2031 is 10,000. According to para 6.12 this is a mixture of 30% local needs and 70% immigration. Not surprisingly adjacent authorities with housing pressures of their own are content to support this through the duty to cooperate. However, the strategy admits this is driven by aspirations to be a centre for growth.

Moreover the strategy should take account of alternatives to new housing allocations including taking account to windfall sites (unplanned small developments) when determining overall need (which it currently appears to discount). **This is needed to ensure the plan is properly justified.**

While the strategy does seek to encourage more town centre living in Stafford (Policy Stafford 1), for example over shops, that is not repeated for Stone. The plan should also aim to reduce the number of vacant properties.

The strategy should also better explain how the release of land will be managed to ensure that the release of greenfield sites does not prejudice housing within the towns. SP7 refers to 'insufficient' brownfield sites but this is ill defined given the extent of the proposed developments around the major settlements. In this respect we generally support the approach to settlement boundaries which contain development and avoid unsustainable sprawl. However, there should not be a presumption that greenfield sites within such boundaries do not have to be controlled if appropriate brownfield sites are available which do not impinge on nature conservation concerns. The performance targets suggest if necessary housing may need to be restricted in areas where it exceeds allocations but it is unclear how this would be done or on what criteria. **This brings into question how the plan will be delivered.**

We welcome the positive approach to conversions where this is appropriate to the environmental and amenity character of the area. We also support the approach to good quality design in N1, in terms of environmental standards, amenity, character and density. Para 47 of the NPPF says they should 'set out their own approach to housing density to reflect local circumstances'. More guidance on where higher density housing will be beneficial in terms of overall sustainability of development is needed to give this policy clarity.

The plan concentrates housing development in Stafford and to a lesser degree Stone. This results from the Sustainability Appraisal at earlier stages of the plan. In general this would seem sound, but we believe additional housing should be considered in other settlements where it can support the facilities and services to ensure they can be sustainable communities.

#### Level of Economic Development

The level of economic development has also been determined on the basis that Stafford is a growth area. Para 2.16 sets out the two extreme methods of working this out. A continuation of past trends suggests a need for 166 hectares of employment land whereas growth in employment would only suggest a need for 25 hectares. Because of the growth agenda the council has decided to provide at the highest level. There is some justification for providing a mixed portfolio of sites and for desiring to change the character of the economy. **However, given the likelihood of continued recession this would appear fairly bullish and we are not convinced this aspect of the plan can be justified.**

#### Level of Retail and Office Development

The plan concentrates retail and office development in Stafford and to a lesser degree Stone. We believe this should be supported provided there is adequate protection for the heritage and environmental quality of the centres. However, given the current recession and the likely time lag for some new development the plan should also identify other ways of supporting the centres. As well as encouraging increased residential use of flats above the shop it should give support for market trading and innovative retail solutions such as pop-up shops.

The plan also needs to control out of town retailing which threatens town centres and also tends to encourage less sustainable shopping habits. Policy E8 says no new development for retail warehouses and superstores is required in edge-of-centre or out-of-centre locations at Stafford. But the policy is less clear about other locations. It says 'If planning permission is granted for retail development the range sold at the

development may be restricted either through planning conditions or legal agreement.’ The NPPF supports a sequential approach in Para 24, where town centre locations are considered before edge of centre and out of centre ‘only if suitable sites are not available’. **Clearer guidance is needed to ensure all out-of-town development is properly controlled in line with National Policy.**

## **Carbon Reduction**

The NPPF puts great store in addressing climate change. Para 93 say ‘Planning plays a key role in helping shape places to secure radical reductions in greenhouse gases.’

We welcome the support for reductions in carbon emissions in the plan, as well as mitigation for the impact of climate change, but we do not feel the plan is clear about how this will be monitored and many of the mechanisms for doing so are vague.

We would like specific reference to carbon reduction in Policy SP1 which sets out the presumption in favour of sustainable development. It would be perverse to give permission for developments (especially in the case where the plan were deemed out of date or silent) if they did not support carbon reduction.

The plan refers to the 2006 Staffordshire Declaration on Climate Change but its targets have now been superseded by those in the 2008 Climate Change Act. These include the target of a 50% reduction in carbon emissions by 2027 compared to 1990s levels. We accept that this is a stretching target but the climate crisis we are facing in the UK and globally demands strong action.

There is also no mention of interim targets, monitoring, or reporting of how this target is to be achieved in Stafford Borough. The performance table refers only to maximising ‘the amount of renewable energy generated in line with national targets’ without explaining how the national targets will be applied to the Borough. **This must bring into question whether the plan is consistent with national policy and its effectiveness in achieving sustainable development.**

We specifically support the aim of zero carbon by 2016 in terms of the code for sustainable homes and the interim requirement of Sustainable Homes Code 4 but this is only one measure of success in a limited field. It also needs to include the embodied carbon of the construction process. The very good or excellent BREEAM rating for non-residential buildings is also welcome. There should also be encouragement for buildings to exceed these limits.

In line with Policy N2 each of the developments for Stafford and Stone are required to provide on-site renewable or low carbon energy solutions including associated infrastructure to facilitate site-wide renewable energy solutions. However, there is little detail and it is unclear how success will be measured. Where there are specific needs for additional service infrastructure for example, new sub-stations for development West and South of Stone, there is clearly an opportunity to link low carbon solutions with wider energy infrastructure. There is also a case for identifying opportunities for specific innovative solutions such as district heating, which is more viable on new build and harder to retrofit and which can significantly reduce energy consumption, especially if linked to local small-scale renewables.

We support the emphasis on SUDS and on provision of recycling facilities within developments. However, we note the lack of a specific target for recycling in the



performance table which speaks generally to maximising ‘the percentage of household waste that is recycled and composted’ Furthermore, given that commercial waste is likely to be a significantly higher stream, it is surprising that the performance table only relates to household waste.

The emphasis on walking and cycling provision is also important for reducing the carbon impact of these new settlements. The plan refers to connections from the new developments to the relevant centres, but neither the transport nor the housing sections and Policy N1 refers to permeability in relation to inter-connection between places, but there should be more stress on the need to design new housing areas to be walking and cycling friendly in themselves. If estates are poorly designed, relying on long curving roads, cycling and walking rates will be low however good the external links. The plan should include a requirement for new developments, particularly the anticipated urban extensions to be designed to encourage walking and cycling as well as avoiding layouts, such as long, windy roads and excessive perimeter fencing which discourages movement.

### Renewable Energy

We support the goal in Policy N3 to ‘maximise the amount of renewable energy in line with national targets’ while also recognising the environmental and landscape quality of parts of Stafford Borough. The plan refers to the Staffordshire ‘Renewable/Low Carbon Energy Study’ which suggests the borough can meet a proportion of its energy needs through renewables, but it is unclear how much that might be or whether it refers only to renewable provision within the borough’s boundary. The 2009 Renewables Energy Directive aims for 15% of renewables by 2020 and this should be something the Borough aspires to whether on its own or taking account of the Duty to Cooperate with neighbouring authorities. Given the current figure of 2.5% (identified in Para 12.21 of the plan) that remains a demanding target but must be part of the ‘positive strategy to promote energy from renewable and low carbon sources’ envisaged in Para 97 of the NPPF. **We question, therefore, whether the plan fulfils this stipulation in the NPPF and how it will be effective in achieving it.**

The plan suggests that wind turbines and biomass will be the most promising sources of renewable energy. However the map demonstrates the limited areas that may be considered appropriate for wind turbines. It is, therefore, critical that other alternatives, such as solar panels and LSOAs with district heating are fully exploited in urban areas.

### **Environmental Policies**

#### Biodiversity

Policy N4 sets out the approach to biodiversity protection and is generally supported. However, it is unclear how this will be monitored in terms of the Government’s aim to halt the overall decline in biodiversity (NPPF Para 109). A similar commitment in N4 for Stafford Borough would be welcome. The monitoring refers to damage to important sites but we believe this is limited. Monitoring needs to identify which and how many developments are providing net gains and whether the aims in the Green Infrastructure strategy or the Stafford BAP are being met.

## Designated Sites

Policy N5 sets out the approach to designated sites. In relation to European Sites the policy should specifically refer to ‘appropriate assessment’ which is currently only in the text.

In relation to SSSIs the N5 appears to go further than the NPPF.

It allows development when: ‘reasons for the development clearly outweigh the nature conservation value of the site itself and the national policy to safeguard the national network of such sites. Cumulative effects will also be considered.’ as opposed to the NPPF which says: ‘proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted. Where an adverse effect on the site’s notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest.’

**The policy in the plan should at least be as stringent as the NPPF policy to ensure it is consistent with National Policy.**

It should say that development will not normally be permitted and it should refer to the special interest features. The policy in N5 also appears to imply a development that might destroy the whole site while the NPPF does not.

## Landscape

We welcome and support the approach in the plan to landscape conservation. The policy would benefit from greater emphasis on the benefits to the community of those assets. New developments should demonstrate how they will enhance those benefits.

## Noise and Tranquillity

We welcome the reference to noise and light pollution in policy N1, although it should specifically identify the need for lighting to be baffled and controlled. Para 123 of the NPPF specifically refers to the use of conditions.

There is no reference to tranquillity in the Plan although this is being increasingly recognised in Government Planning Policy. Para 123 of the NPPF says local authorities should ‘identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.’ **The council should, therefore, adopt recognised tranquillity mapping or undertake its own to ensure adequate protection is in place so it can effectively implement the NPPF.**

## Heritage

We also welcome the protection of the historic landscape. However, we are surprised that there is no reference to the exceptional nature of development in the highest level of sites identified in Para 132 of the NPPF, although they are referred to in the text or to a

positive approach to the protection of Conservation Areas, also referenced in the text. Given the historic nature of much of the borough this would seem essential.

### Green Belt

The plan properly protects the Green Belt in line with the Green Belt purposes set out in the NPPF (Para 80) and in particular considers major developed sites in the Green Belt in Paras 9.20-9.25. However, the NPPF also says that Local Authorities should ‘plan positively to enhance the beneficial use of the Green Belt’. This includes providing access, enhancing the landscape and biodiversity.’ **While the plan deals with these in general in other sections it is not clear how this positive aspect of planning will be achieved specifically in the Green Belt to meet the guidance in the NPPF.**

### **Amenity**

The Plan includes a list of amenity improvements for both Stafford and Stone, including Green Space, Play Areas and Allotments. We welcome this but it is unclear how this will be achieved since some of this is very demanding. For example there is currently a 3 year waiting list for allotments in Stafford. The performance tables set out general levels of provision but these are incomplete. In particular a target for provision of allotments should be included, with greater attention given to satisfying demand.

Moreover, not all areas of green space are generally accessible to the public, for example Stafford Golf Course and the Riverway.

**For the plan to be effective there needs to be an implementation plan for allotment provision and green space which is accessible to the public, with good mapping.**

Community Gardens should also be specifically supported in the plan and locations where provision might be sought identified.

### **Transport**

We support the policy to reduce the need to travel by private car in policy T1. However, the policy is restricted to urban areas. While acknowledging that car dependency in rural areas will always be higher, we are not convinced that they should be entirely exempt from policies to control travel by car. The NPPF (Para 32) does not restrict this to urban areas but says it should depend on the ‘nature and location of sites. There is also some ambiguity about what amounts to ‘urban areas’. Most travel is under five miles and this will include short trips in small settlements which could be done by foot or cycle.

**Further guidance is needed in this regards if the plan is to be consistent with National Policy and effective.**

Moreover, if the Plan prioritises ‘Living within environmental limits’ it is logical to include a target for reducing car use. This would include reviewing infrastructure which encouraged more car traffic, such as the Western Access and Northern Access improvement schemes, and the implementation of Phase 1 of the Eastern Distributor Road

We also welcome the ban on development which generates large amounts of car use which cannot be accommodated on the network. However we would suggest the policy should go further and developers should be required to demonstrate that they have adopted all reasonable measures to reduce car use. This would include the amount of car

parking they provided and the provision for other modes. There should be consideration of residential developments specifically designed for non-car owners, particularly in town centres where car parking would be at a minimum. This would fit in with the carbon reduction strategy of the plan. This would also fit with Para 32 of the NPPF.

The plan gives little detail about how access to the railway stations will be improved. In particular there remain significant pedestrian and cycling barriers between Stafford railway station and the town centre and other parts of the town. At the least we would like to see early work to consider options for improving those links.

Lastly we reiterate the concerns relating to cycling and walking within new developments, especially urban extensions. And while we welcome the general support for cycling and walking links the walking and cycling policy should also specifically address barriers to walking and cycling (such as unfriendly junctions and road crossing) both in terms of new transport links and upgrading existing facilities. In this respect the NPPF (Para 35) specifically refers to minimising 'conflict between traffic and cyclists or pedestrians' as well as the establishment of 'home zones' for which little consideration appears to have been given.

### **Tourism**

We welcome the support in Policy E6 for 'opportunities that reduce the carbon footprint of the development and promotes sustainable tourism.' However, all new tourism proposals should aim to minimise their carbon impacts. Tourism and leisure activities, especially at inaccessible rural locations, can have a major impact on carbon emissions so this needs to be clearly articulated.

We also welcome the recognition of the importance of tourism not impacting on the environment. The plan would benefit from adopting the term 'sustainable rural tourism' (NPPF Para 28) and reference to 'respecting the character of the countryside'

### **Marinas**

Policy E7 covers all development close to canals. We are concerned that whereas development for general canal facilities includes requirements in relation to wildlife, nature conservation and landscape (caveat 7 and 9) this is not applied to marinas and moorings or to other canalside development. There is no clear reason for this. Given the importance of canals to biodiversity, conservation and urban and rural landscapes we believe these caveats should be extended to all developments covered by Policy E7.

### **Agriculture**

Policy E2 refers to agriculture as part of the general rural economic proposals. We believe this underplays the importance of agriculture, and local food production in particular. The plan should promote the value of agriculture more clearly, supporting local sourcing of produce, encouraging a diversity of production and strengthening links to other key elements of the local food web, such as Farmers Markets. It should set out the importance of agriculture in meeting sustainable development goals, particularly addressing the pressing need to provide food in this country and more widely with a growing population and the impacts of climate change,

It should also specifically identify the need to protect valuable agricultural land from development.

**In particular it should seek to protect Land in grades 1, 2 and 3a of the Agricultural Land Classification in line with Para 112 of the NPPF which says: ‘Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.’**

### **Infrastructure**

The provision of infrastructure is critical to the delivery of any plan but where a plan relies as heavily as the Stafford Borough Plan on significant new housing development in the form of urban extensions it is essential that it is delivered. We note the table on Page 120 includes significant expenditure. We are particularly concerned that the social infrastructure such as healthcare and education facilities are provided in a way that helps reduce travel. We are also concerned about funding for walking and cycling links and green infrastructure. The potential for funding from CIL is likely to be limited and issues about S106 contributions and viability may cause problems. We do not want to see housing estates with few facilities and major new roads through them encouraging travel. We are not in a position to comment in detail but the scale of the uncertainty in the table causes us some concern.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Annette Holland
Comment ID	PS181
Response Date	26/02/13 01:03
Consultation Point	3.5 Paragraph ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Justified  
. Consistent with national policy

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

*Sustainability and runoff, etc., from new construction projects* I am concerned at the lack of provision made in the borough plans as regards runoff and foul sewage from new developments. While the view expressed at the local meeting on the borough plan I attended was that this year was exceptional as far as weather was concerned and local flooding was an anomaly, many weather simulations seem to point to the increased rainfall becoming a permanent feature of British weather. I am therefore of the view that all new developments submitted to planning must include proper provision for the kind of 'exceptional' spill off we have experienced over the past few years if those new developments are to be sustainable. This is particularly the case in key service villages such as Gnosall where a problem with flooding was acknowledged long before the 'exceptional' rains this year and the fact that the Parish acknowledges that some of the local flooding experienced this year may be due to the additional runoff from new piping of runoff from the centre of the town. Any new developments can only add to the existing problem and future-proof arrangements therefore need to be made in any plans for new

housing given that Severn Trent Water will be responsible solely for strategic waste water infrastructure. For developments to be sustainable, it must be ensured that businesses and households are not placed in a position where they are unable to obtain insurance for flood risk or are unable to afford such insurance. This is particularly true for developments involving social housing. As it stands, there is no obvious evidence base for this issue to ensure that the borough plan meets the government policy criteria of mitigating and adapting to climate change (National Policy, point 3.5). (attach separate sheets as necessary)

**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.**

As it stands, there is no obvious evidence base for this issue to ensure that the plan meets the government policy criteria of mitigating and adapting to climate change (National Policy, 3.5). Proper estimates of the potential increased runoff from the new developments and the plans and costs for mitigation, flood prevention, etc. need to be compiled. A revision of maps setting out high risk areas to allow for the latest rainfall figures and flooded areas would also be appropriate, notably to align with areas where flood risk insurance is now problematic.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Cannock Chase AONB Partnership ( Ruth Hytch)
Comment ID	PS182
Response Date	25/02/13 15:20
Consultation Point	36 Policy N6 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Consistent with national policy

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

Whilst the AONB Joint Committee is fully supportive of the policy approach to the SAC, it is considered that, as worded, the policy could result in the development of alternative sites or mitigation measures in other areas of the AONB where there may be an adverse impact on the landscape, scenic beauty and quiet enjoyment of the AONB, beyond the consideration of nature conservation.

**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.**



Accordingly a minor, but significant amendment, adding a fourth criterion, is suggested to the policy, as detailed below (highlighted in **bold** ):

Policy N6 Cannock Chase Special Area of Conservation (SAC) Development will not be permitted where it would be likely to lead to an adverse effect upon the integrity, directly or indirectly, of the Cannock Chase Special Area of Conservation (SAC). To ensure this site is not harmed all development within the Stafford Borough area must take account of the following criteria: *i. No development involving a net increase in dwellings will be permitted within the buffer area around the SAC (400 metres), as defined on the Policies Map unless, as an exception, the form of residential development would not have an adverse effect upon the sites' integrity; ii. Between 400 metres and 12 miles, as defined on the Policies Map, development will be expected to take all necessary steps on-site, to avoid or mitigate any adverse effects upon the site's integrity or, where this cannot be achieved within the development, make provision for mitigation measures designed to avoid such adverse effects taking place as set out in the Cannock Chase Visitor Impact Management Strategy. iii. Large developments within 400 metres and 12 miles of the SAC will also be required to provide targeted alternative green space within or close to the development site. The effective avoidance and/or mitigation of any identified adverse effects must be demonstrated and secured prior to approval of the development through developer contributions as set out in the Cannock Chase Visitor Impact Mitigation Implementation Plan. **iv. In each case, proposed and approved mitigation measures, must take account of the wider provisions of the AONB Management Plan, and consider any potential impact on the landscape and scenic beauty of the AONB within and outside the SAC.***

*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

**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**

Either the Partnership Planning Adviser or I am happy to appear, should the Inspector have any questions about the issues raised and to provide any further information that is required about the AONB. However, if the Inspector and/or the Council consider that an appearance is not necessary, I would be happy for this point to be dealt with through written representations.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Annette Holland
Comment ID	PS183
Response Date	26/02/13 01:03
Consultation Point	12.19 Paragraph ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Justified  
. Consistent with national policy

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

*Energy generation and sustainability Wind farms* Land above and below Gnosall Heath is allocated to massive wind farms. There are no figures in the borough plan showing that there is sufficient wind in either area for such developments to be sustainable or indeed viable. Furthermore, what grounds are there for believing that the currently allocated sites would generate more electricity than, say, turbines along the uninhabited parts of the canal network, which acts as a form of wind tunnel in certain places. Nor is there any impact study on how the electricity they generate would be fed to the national grid. Given the controversy in many areas about new pylons marching across beautiful open countryside, this would seem to be a major and fatal failing. This development is therefore insufficiently justified and its sustainability is not proven. While the principle is laudable, the allocation of such specific sites cannot align with government policy given the lack of evidence base. (See Point 12.19 - "identifying suitable areas for renewable and low carbon energy sources").

**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.**

An evidence base is entirely lacking undermining the credibility of any identification of "suitable areas for renewable and low carbon energy sources"). This whole section needs reworking.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Annette Holland
Comment ID	PS184
Response Date	26/02/13 01:03
Consultation Point	12.19 Paragraph ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Justified  
. Consistent with national policy

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

*Energy generation and sustainability* For new developments to be viable there is a need to make provision for the fact that energy is becoming scarce and expensive. Given the high overall costs of nuclear including the decommissioning costs, the problems with fracking in a country where mining dates back to pre-Roman times but mining records are only of relatively recent date, microgeneration or developments such as heat pumps (including the use of disused mines for local heating systems) must surely be an essential prerequisite for sustainable development and in particularly for social housing where the money for households to pay for higher energy costs will be very limited. If a criterion of 40% social housing can be imposed for developments of a certain size, surely it must equally be essential to impose a criterion for all new developments to have solar panels for electricity or hot water generation, heat pumps or the like, if those developments are to be sustainable and affordable in the long term and certainly over the life of the plan.

**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.**

Again, there is no evidence base to show compliance with government policy on "moving to a low-carbon Economy" (National policy, point 3.5 and borough plan point 12.19 - "local planning authorities should contribute to energy generation from renewable or lowcarbon sources"). The potential of wind turbines lacks any evidence base, there is no reference to the potential for heat generation from disused mines in the area, the potential for fracking is not addressed, etc., etc.

If a criterion of 40% social housing can be imposed for developments of a certain size, surely it must equally be essential to impose a criterion for all new developments to have solar panels for electricity or hot water generation, heat pumps or the like, if those developments are to be sustainable and affordable in the long term and certainly over the life of the plan.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Annette Holland
Comment ID	PS185
Response Date	26/02/13 01:03
Consultation Point	6.61 Paragraph ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Justified  
. Consistent with national policy

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

**1) Settlement boundaries** To prevent any incitement to property speculation and other land abuses, It is crucial that it be ensured that the current settlement boundaries are maintained pending the adoption of the new local plans, despite the fact that they are in essence abolished by the new borough plan. (See point 6.61). It is otherwise inconsistent with the localism bill.

**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.**

It must be stated that the current settlement boundaries are maintained pending the adoption of the new local/neighbourhood plans.

*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



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

Ref:

**Representations Form**

**(For official  
use only)**

**Please return completed forms to:**

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

**Responses must be received by 12 noon on Thursday 28<sup>th</sup> February 2013**

**This form has two parts:**

**Part A:** Personal Details

**Part B:** Your representations.

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



# Part A

## I. Personal Details\*

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

## 2. Agent's Details (if applicable)

Title	MR	
First Name	TIM	
Last Name	FURNELL	
Job Title (if applicable)	PLANNING CONSULTANT	
Organisation (if applicable)	TF PLANNING	
Address Line 1	6 THE RISE	
Address Line 2	WALTON ON THE HILL	
Address Line 3	STAFFORD	
Address Line 4		
Postcode	ST17 0LH	
Telephone Number	01785 602513 0780 5343990	
E-mail address	tim.furnell1@ntlworld.com	

## Part B – Please use a separate sheet for each representation

Name or Organisation	TIM FURNELL BA (HONS) MRTPI TF PLANNING
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**3. What part of The Plan for Stafford Borough (including the Policies Maps document) does your comment relate to?**

e.g. Policy Reference, Paragraph, Map title	Key Objectives (11) para. 5.2  Policy Stafford 1 – Stafford Town  Policy Stafford 4 – East of Stafford – Housing i. and Transport xv.  Policy T1 & T2 – Transport – para.10.5  Policies/Proposals Map – Stafford Area Inset
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*If your comment does not relate to a specific part of the document, or it relates to a different document, for example the Sustainability Appraisal, please make this clear in your response.*

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

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

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

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

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

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

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

In respect of the Plan's references to the Stafford Eastern Distributor Road (EDR):

- South of the Strategic Housing allocations shown on the Stafford East Concept Diagram (page 60), the only route details/indications are on the Policies/Proposals Map (Stafford Area Inset) and the Consultation Portal (if EDR is selected as an option). The only text reference to protection of this route is at para. 10.5. There is no policy or other explanation of the rationale for the concept of an EDR, any explanation as to what "protection" entails, or why the particular route around Walton on the Hill has been resurrected/included given that it is not a component of the current or emerging Local Transport Plan, or the Draft Stafford Borough Integrated Transport Strategy
- There is no supporting evidence which provides status or certainty of delivery for an EDR
- There has been no consultation or engagement with the local Parish Council or local residents directly affected by the proposed route in accordance with the principles set out in the adopted Statement of Community Involvement (SCI). Were such a route to 'survive' in the adopted Local Plan it would be revealed in any Property Search for the numerous dwellings along and adjoining the route and yet none of these properties has been consulted and the Parish Council (Berkswich) were not aware of the route until this was made clear to them at a Parish Council meeting on 5<sup>th</sup> February 2013 by myself. The route itself is very difficult to establish or identify to those unaccustomed to Local Plan matters and the main vehicle for consultation, the Council's Consultation Portal only indicates the route if a particular option amongst the many in the 'Legend' is chosen.
- There are no proposals or explanation of how the proposals for Phase I of an EDR will provide for an acceptable and deliverable potential southern extension of an EDR. The Concept Diagram (page 60) indicates the termination of EDR Phase I on a minor country lane leading to major constraints in the form of the River Sow floodplain, St Thomas Lane and Priory, crossing the West Coast Main Line and replacement railway bridge. The Council's own Infrastructure Strategy – Stage I Final Report (July 2009) para. 2.4.4 refers to these issues as:

*"However, south of Tixall Road (to the A34) the EDR would face several difficult (if not insurmountable) challenges to implementation."*

This report also refers to the absence of any allocated funding in the current Regional Funding Allocation or Local Transport Plan.

There is no rationale or sustainable case for an EDR and therefore the status provided to it in the Stafford East Strategic Housing allocations and the concept of a protected route extending south to link to the A34 (Cannock Road) is fundamentally flawed and without proper evidence or substance. The lack of any adequate consultation with local communities or residents is contrary to the adopted SCI. The EDR concept seems to be a further attempt by the County Council as Transport authority to cling onto historic and out-dated proposals, which have no status in their own LTP or other Transport related strategies. The Local Plan should not continue or reinforce an unnecessary and undeliverable route.

(attach separate sheets as necessary)

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

- Delete any Plan references to an EDR
- Amend the Stafford East Strategic Housing Policies and Concept Plans to provide for estate distributor road access and infrastructure only
- Delete the Protected Route shown on the Policies/Proposals Maps

(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**

The issues surrounding an EDR are in part clouded by past proposals from the County Council in respect of the options around Walton on the Hill and by a lack of public awareness of the EDR Protected Route proposals in the current Plan.

Also it is understood that further (new) material will be provided by the County Council in respect of an EDR at or shortly before any Examination in Public, and this material will not have been open for scrutiny or public consultation.

(attach separate sheets as necessary)

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

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

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

**Representation Form Guidance Notes**



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

**Representations should therefore focus on legal compliance and soundness.**

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

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

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

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

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

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

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Creswell Parish Council (Mrs Lisa Horritt)
Comment ID	PS187
Response Date	26/02/13 10:43
Consultation Point	The Plan for Stafford Borough - Publication ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.4
Files	<a href="#">Creswell Parish Council : SBC Local Plan 2013 - PreSubmission Consultation Response - Feb 2013</a>

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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

- . Positively prepared
- . Justified
- . Effective

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

Second attempt to load our complete response as a single document (attachment).

*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

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.** [SBC Local Plan 2013 - Pre-Submission Consultation Response - Feb 2013\\${8386030344011818062}.docx](#)

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Stan Robinson (Stafford) Ltd ( )
Comment ID	PS188
Response Date	26/02/13 11:02
Consultation Point	16 Policy E3 ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

We act on behalf of Stan Robinson (Stafford) Limited, the owner and operator of substantial premises at Ladfordfields Recognised Industrial Estate. The company is also owner of adjacent land at Ladfordpool Farm to the north east and north west of, and immediately adjacent, to the Industrial Estate and have made representations consistently through the Development Plan making process seeking allocation of that land for expansion of the Ladfordfields RIE, inter alia, to accommodate the company's future expansion needs. Stan Robinson (Stafford) Ltd wishes to support the Council's strategy set out in Policy E3. This is considered a pragmatic approach to sustainable economic development provision for the rural area of this part of the Borough. It is consistent with the advice in para 28 of NPPF and will help to secure economic growth and a strong and competitive economy. In our view, clearly there are no comparable established employment areas in this part of the Borough that could sustain or fulfil a similar role and function.



**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 above

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Stan Robinson (Stafford) Ltd ( )
Comment ID	PS189
Response Date	26/02/13 11:04
Consultation Point	17 Policy E4 ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Effective

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

We act on behalf of Stan Robinson (Stafford) Limited, the owner and operator of substantial premises at Ladfordfields Recognised Industrial Estate. The company is also owner of adjacent land at Ladfordpool Farm to the north east and north west, of and immediately adjacent to, the Industrial Estate and have made representations consistently through the Development Plan making process seeking allocation of that land for expansion of the Ladfordfields RIE, inter alia, to accommodate the company's future expansion needs. We have no objection in principle to Policy E4 and indeed seek to positively support the policy. Rather, we seek to suggest amendments to the text of the policy, which amendments, we believe will make the policy more effective. **Criterion (i)** - rather than "reduces impacts" we suggest the text be amended to "**minimise or appropriately mitigate impacts on the surrounding area and landscape**". This, we believe, to be a more practical and workable form of words. Conceivably, it may not be possible to "reduce" impacts and therefore mitigation may then be appropriate. **Criterion (v)** - neither Raleigh Hall nor Ladfordfields Recognised Industrial Estates are particularly close to any

"existing settlement". Indeed, in part, this is a factor in their success as industrial estates, ie in the Ladfordfields case the estate is near Great Bridgeford and Seighford but not close and certainly not within easy walking distance. We suggest therefore that the first sentence be amended as follows:- **"An access, transport and travel plan strategy, which identify appropriate access points between the site and the local highway network."** In the second sentence of criterion (v) reference is made (at the end of the sentence) to "as well as deliver local transport network measures". We are unsure what is meant by "measures" in this case but in any event we believe that this reference is duplicated by criterion (x). We recommend therefore that **"as well as deliver local transport network measures" be deleted from criterion (v). Criterion (vii)** - it stands to reason that any development at Ladfordfields will need to take account of existing easements associated with the existing water main crossing the site. (The representations now made by the Water Company suggest that the requirement to reinforce the water supply at Raleigh Hall is no longer relevant.) We recommend therefore that criterion (vii) be redrafted as follows:- **"(vii) Safeguard the water main crossing the Ladfordfields site." Criteria (viii), (ix), (x) and (xi)** - it is by no means certain that these infrastructure requirements (for electricity, drainage, highways and gas) are essentially required to serve any future development that may take place at Ladfordfields. Much will depend on the nature and composition of any particular proposal. **We recommend therefore that "if necessary" be added to the text of each of the criteria (viii), (ix), (x) and (xi) either as a prefix or suffix.** We reiterate our client's support for Policy E4 as it relates to the expansion of Ladfordfields RIE and hope that the constructive representations set out above will render the policy more effective and thus, the Plan, more sound.

**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 above

*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

**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**

There is evidence to be adduced which requires a level of scrutiny that can only be secured by Examination in Public.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	on behalf of Fradley Estates ( Paul Sharpe Associates on behalf of Fradley Estates)
Comment ID	PS190
Response Date	26/02/13 11:07
Consultation Point	13 POLICY STONE 2 ? WEST & SOUTH OF STONE ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

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

On behalf of Fradley Estates Ltd, the owner of land on the East side of Stone, we object to Policy Stone 2 - West and South of Stone. This objection is in two parts, firstly that development is restricted to 500 dwellings post 2021 and, secondly that such development is to be directed to "West of Stone". Current national economic conditions are not temporary and it is likely that it will take the majority of the Plan period to recover to a reasonable level. Consequently, the need now (and probably throughout the Plan period) is to stimulate development and growth and to avoid putting artificial barriers in the way of such growth. Whilst the current inactivity in the housing market is probably due in greater part to the supply of mortgage finance, it is imperative that Core Strategies prepared in this period of relative

inactivity in the housing market do not put artificial constraints in the way of sustainable new development and, instead, should seek positively to stimulate such development. Again, as far as the housing market generally is concerned, new supply is at an all time low and there can be no argument that the need for additional housing, including affordable housing, is overwhelming. Again therefore unnecessary constraints on housing development in sustainable locations should be avoided. We appreciate that Stafford is designated as a Growth Point and accept that the bulk of such housing growth is to take place in and around Stafford town itself. However, the provision of a mere 500 additional houses at Stone is not in our view consistent with sustainable development needs. Providing for a mere 500 additional dwellings at Stone is, in our view, tantamount to the rejection of a sustainable development opportunity contrary to Government policy in the National Planning Policy Framework. We conclude therefore that additional housing provision at Stone, over and above the 500 currently planned, would accord with the principles of sustainable development and would not undermine green belt objectives nor indeed undermine regeneration initiatives within the Potteries conurbation. As far as the Strategic Development Location West of Stone is concerned, we believe that this choice is excessively prescriptive in that it would generate too great a focus of development in the A34/Whitebridge Lane/former Doulton site area where new housing development took place during the 90's and first decade of this century. As a result, the new housing development in this part of Stone has had little time to integrate with the existing community and allow the adjustment of community mechanisms. On the other hand, the major housing development that has taken place on the East side of Stone took place largely in the 1980's and has now matured and become entirely assimilated into and is now part of the community of Stone. All existing physical, social and economic infrastructure to support additional development is in place in that area with a general absence of sensitive nature conservation or landscape designations. Consequently, we would suggest that land East of Stone be put forward as a Strategic Development Location for circa 100 dwellings either:- (i) in addition to West and South of Stone, because total housing provision in Stone should, in our view, be increased in any event, or (ii) partly in lieu of provision West and South of Stone, thereby making the community impact of new housing on the town overall to be more easily absorbed. Please note that the crossing of the West Coast mainline railway by Uttoxeter Road does not in our view constitute a determinant or overriding constraint to new development on the east side of Stone as inferred in para 8.2. Appropriate evidence has been submitted to the Council to demonstrate that the crossing does not provide an overriding constraint. It is unfortunate that the Council refused to engage with the landowner regarding what, in our view, is a "reasonable" alternative (or addition) to the West and South of Stone allocation. We do not seek to argue that land West of Stone is not suitable or not sustainable. However, land East of Stone is in fact much more sustainable because existing infrastructure is already in place; it is a highly successful residential location, ie where people want to live; a site there would provide the choice of housing site location sought by the key objectives of the Plan; development there would not impact on the Green Belt or any site of nature conservation value; the location has an equally good relationship to Stone Business Park; it can be developed without major calls on public sector investment and contrary to the inference in para 8.2, development at East of Stone would not be constrained by the Uttoxeter Road crossing of the West Coast mainline or the need for a bridge crossing of that line. A strategic allocation East of Stone would extend to about 6 hectares and has previously been promoted to the Core Strategy process by this practice on behalf of Fradley Estates Limited and is recorded as site 269 in the SHLAA. The site would have a capacity of circa 100 dwellings. Access to the site would be available from the existing highway network within the Aston Lodge Park Estate at two points, ie using existing highway infrastructure. Connection to the existing foul and surface water drainage system is available without the need for capacity improvements, ie using existing infrastructure. The land is not identified as being of any particular nature conservation value and its landscape quality, whilst pleasant, is of no greater quality than that West of Stone or South of Stone. The land is not located in an Area of Outstanding Natural Beauty nor within the North Staffordshire Green Belt or any conservation area. A Transport Assessment by BSP Consulting which analyses the potential impact of traffic likely to be generated by development of the land for housing on the Uttoxeter Road crossing of the West Coast mainline and on the traffic light controlled junction of Uttoxeter Road and Lichfield Road has previously been submitted to the Council. This Assessment demonstrates that the location is a highly accessible and sustainable one with a frequent bus service and with other transport infrastructure available facilitating journeys by non-car modes. The additional traffic likely to be generated on Uttoxeter Road west of the proposed development at peak times would be less than 9% and therefore not significant. Traffic queues at the level crossing were observed and analysed. Barrier closure times, and thus queue lengths, vary but the analysis shows that, on average, the proposed development would add only 1 vehicle to the queue. Consequently, it can be concluded that the proposed development would not

have a significant impact on queuing at the level crossing. The percentage increase in traffic at the Uttoxeter Road/Lichfield Road signal junction at peak times was calculated at 4.2 - 4.9% and the junction appears to work well with a large amount of spare capacity. Therefore, traffic arising as a result of the development proposals would have an insignificant impact on the junction. The clear conclusion therefore is that a strategic allocation of about 100 dwellings East of Stone would not be unacceptably constrained by the presence of the West Coast mainline. A new bridge crossing of the line is not a prerequisite for the scale of development now put forward East of Stone. As previously set out in the representations made on behalf of Fradley Estates Ltd regarding land East of Stone, this location is a highly sustainable one; rounding off the south east edge of Aston Lodge Park; utilising existing infrastructure thereby minimising the need for further public investment and with good links to employment and to central facilities. The Council's failure to appropriately consider a reasonable sustainable alternative, in our view, renders the Plan unsound.

**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 above

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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**

There is evidence to be adduced which requires a level of scrutiny that can only be secured by Examination in Public.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	on behalf of Fradley Estates ( Paul Sharpe Associates on behalf of Fradley Estates)
Comment ID	PS191
Response Date	26/02/13 11:09
Consultation Point	8.24 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

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

On behalf of Fradley Estates Ltd, the owner of land on the East side of Stone, we object to the statements in paragraph 8.24 and similar comments in para 6.24 seeking to enhance the role of Stone as a market town. We support the meeting of housing need by providing a range of development locations. However, it is axiomatic that with an acknowledged lack of brownfield sites within the urban area of Stone by concentrating new housing development in a single allocation to the West of Stone a range of development locations will **not** be provided. Identification of land to the East of Stone, either in partial substitution or in addition to that to the West of Stone would indeed provide the sort of range and choice of development location required by Key Objectives. Consequently, we fundamentally disagree with the development strategy for Stone. In our view, a greater number of allocations are

required for the strategic location that is Stone. As a general principle, in spatial terms, we see no reason to hold back housing provision at Stone (a highly sustainable location) because the need to provide additional new housing must override any doctrinaire phasing considerations. It seems to us that the Council's approach to phasing is based on the supposition that the housing market will return to pre-recession levels and that that recovery will happen quite soon. However, most learned opinion suggests the contrary and that recovery will be a lengthy process and that the excesses of previous housing booms are unlikely to recur soon. For the foreseeable future therefore, ie the Plan period, the objective must be to stimulate rather than constrain house building and therefore the "deferment" of housing delivery at Stone post 2021, cannot reasonably be justified. Since the "Strategic Policy Choices" document the Council has changed its reasoning for phasing at Stone from one based on doctrinaire phasing policy to one favouring protection of regeneration in the Potteries conurbation. However the Council has produced no evidence that the historic house building rates in Stone have indeed prejudiced that regeneration over the last 30 years. In the absence of such evidence there is no justification for artificially constraining housing development at Stone to post 2021. However, without prejudice, we acknowledge that some control over the timing of new housing development West of Stone may be justified, ie to allow the new housing development that has taken place in that part of the town in recent years, for example at Whitebridge Lane, Doultons etc, to be absorbed into the community. Such "need for assimilation" would not arise East of Stone as development there took place many years ago and the appropriate infrastructure necessary to support new housing development in that location is already in place and the development is now mature. We conclude therefore that the development strategy for Stone over-concentrates development in a single location; does not facilitate housing choice; unnecessarily constrains the house building industry and the deferment of development to the latter part of the Plan period is not, and cannot be justified. In response, we recommend the inclusion of an additional allocation East of Stone for about 100 dwellings with development there taking place prior to development at West of Stone.

**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 above

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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**

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## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	on behalf of Fradley Estates ( Paul Sharpe Associates on behalf of Fradley Estates)
Comment ID	PS192
Response Date	26/02/13 11:11
Consultation Point	25 ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

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

We act for Fradley Estates Limited, the owner of land on the east side of Stone, and object to the approach to affordable housing provision. We note from the preceding "Strategic Policy Choices" report that there are no postcodes in the Stafford area where viability is described as " **good** ". All are described as " **challenging** " or at best " **relatively good** ". In Stone on the other hand viability is described, unequivocally, as " **good** ". In our view therefore it makes no sense, in affordable housing terms, to suppress housing provision in the second most sustainable location in the Borough which has the greatest potential for delivering affordable housing. Notwithstanding the findings of the Affordable Housing Viability Study, we find it hard to believe that a 30% affordable housing contribution is achievable in the current market across large parts of the Borough. Again, the housing market in the

northern part of the Borough is described as the most viable but, in the Plan, housing policy is not set to capitalise on this market finding. In our view, the approach to affordable housing should capitalise on the market potential of the northern part of the Borough (or at least not ignore that potential) to leverage reasonable levels of much needed affordable housing. To plan for affordable housing in diametric opposition to the market in these times of nil public subsidy is, in our view, bound to lead to low delivery of affordable housing. On this basis, in our view it is likely that the Plan will be found to be unsound.

**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 above

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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

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

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## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	on behalf of Fradley Estates ( Paul Sharpe Associates on behalf of Fradley Estates)
Comment ID	PS193
Response Date	26/02/13 11:12
Consultation Point	7 SPATIAL PRINCIPLE 7 (SP7) ? SUPPORTING THE LOCATION OF NEW DEVELOPMENT ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

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

On behalf of Fradley Estates Limited, the owner of land on the east side of Stone, we object to the use of criteria based policies for determining the distribution of housing in the Key Service Villages and the acceptability of development in the wider Rural Area. This objection is consistent with our objection to the distribution of high proportions of overall housing provision to Key Service Villages and Rural Area of lower sustainable credentials than the second most sustainable and underexploited location in the settlement hierarchy, ie Stone. In our view, a much lower proportion of overall housing (say 6%) should be apportioned to the Key Service Villages and this should be delivered via specific site allocations rather than via a settlement boundary or criteria based approach. In the past, polices

relating to "infill only" even in identified villages and "housing for local needs only" has proved ineffective in controlling housing development in the rural area in Stafford Borough, particularly at appeal, ie despite statutory development plan policies to the contrary. As for development in the wider Rural Area (if housing growth is to be directed to that location), it is difficult to envisage how development could be controlled other than via criteria based policies. However, unlike historic policies, these criteria need to be focussed more directly on sustainability criteria because, inherently, such development will be less sustainable than similar development at Stone. For example, criterion (d) requiring the provision of viable public transport (ie without public subsidy) rules out virtually all housing development outside Stafford and Stone and possibly many of the Key Service Villages. The intention set out in the preceding "Strategic Policy Choices" is that this development should be very small in scale. As indicated above, this approach is more liberal than that included in statutory local plans in Stafford Borough in the 1970's and 80's when a strict prohibition on development within the Rural Area and only minor infill development in some villages proved ineffective. Now, the alternative in SP7 is much more liberal and so development in the wider Rural Area would, in our view, be virtually unconstrained and therefore relatively unsustainable. In our view, a total embargo on development in rural areas is not feasible and NPPF requires Development Plan policies to support and sustain rural areas. The clear conclusion therefore is that overall housing provision should be increased and not artificially suppressed by the Development Plan process.

**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 above

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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

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## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	on behalf of Fradley Estates ( Paul Sharpe Associates on behalf of Fradley Estates)
Comment ID	PS194
Response Date	26/02/13 11:14
Consultation Point	4 SPATIAL PRINCIPLE 4 (SP4) ? STAFFORD BOROUGH HOUSING GROWTH DISTRIBUTION ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

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

On behalf of Fradley Estates Limited, the owner of land on the east side of Stone, we object strongly to the proposed distribution of housing provision. Firstly, we do not agree that the preferred approach constitutes "growth". Previous Plans have not been based on Growth Point principles and therefore past delivery rates have not been based on growth. Consequently, the continued application of those same annual rates cannot, by definition, deliver growth over the Plan period. Secondly, Stone is the second most sustainable settlement in the Borough. As acknowledged in para 6.24 " **having the potential for growth** ".. Stafford and Stone are located between green belts, ie the West Midlands

Green Belt and the North Staffordshire Green Belt respectively. They are not located "within" a Green Belt. Also, Stafford Borough Council is committed to the concept of a Growth Point at Stafford and, by implication, that the concept of Growth Point is consistent with Green Belt policy, ie consistent with both Green Belts. Rhetorically, if the concept of Growth Point at Stafford was not consistent with or worked against Green Belt objectives, then the Council would not have sought and pursued the Growth Point concept for Stafford. It follows therefore that the Growth Point at Stafford will draw in development potential from the West Midlands Conurbation and from the Potteries Conurbation. Whilst the two Green Belts will work to focus development into regeneration within their areas of influence, the Growth Point potential at Stafford will inevitably draw from both conurbations. Consequently, for as long as Stafford remains a Growth Point there is no logic in artificially suppressing the sustainable development potential of Stone. If development investment potential is going to leapfrog the Green Belt then it is logical to direct that investment to Stafford and to Stone - the most sustainable locations - rather than to rural settlements, outside the Green Belt itself. Stafford will be the greater attractor of development investment from the Potteries than Stone and thus some adverse impact on that conurbation may occur. However, Stone (more so than Stafford) has an established residential relationship with the conurbation and provides a long established and attractive residential choice. There has been no evidence to suggest that the scales of development that have taken place in Stone over the last 40 years have had any material adverse impact on regeneration initiatives in the conurbation. This again leads to the conclusion that there can be no logic in artificially suppressing the sustainable development potential of Stone. Uniquely, it appears that in the past the delivery of housing in Stone has matched that set for it by Local Plans. Local Plan residential policies seem to work in Stone in stark contrast to the failure of policies in the rural area. Housing at Stone over the last 40 years has been artificially suppressed to bolster regeneration policies in the North Staffordshire Conurbation. Bearing in mind the success of Local Plan residential policies in Stone, (and acknowledging the NPPF golden thread of securing sustainable development) there can be no logic in holding back sustainable development at Stone and certainly not to a level below that of previous (itself suppressed) levels of provision. For similar reasons, the holding back of housing development in Stone until 2021 has no logic. Indeed, this approach flies in the face of sustainable development principles and is unlikely to survive inspection at EIP. It appears to us that this approach is also unsound because it is impractical. Summarising, previous housing policies have seen Stone delivering on suppressed housing targets; Stafford on the other hand has underperformed, while key villages and the rural area have been out of control and have seen significant housing numbers delivered in the least sustainable locations. Now, the Council's approach would see housing provision in Stone (the second most sustainable location in the Borough) suppressed further while the key villages (Sustainable Settlements) are to be artificially stimulated by redrawing settlement boundaries in order to attract even more unsustainable housing development. This approach is clearly a recipe for unsustainable development. The Council's approach would see housing provision redirected from Stone and located instead in less sustainable locations in Key Service Villages and in the Rural Area. What further compounds the illogical approach is an acknowledgement that there is insufficient capacity within the boundaries of those villages and that those boundaries will have to be expanded to accommodate that growth. Clearly, a green field extension at Stone is, by definition, more sustainable than a green field extension at a rural village. Furthermore, with (presumably) relatively smaller scale sites in the Key Service Villages and Rural Area they will have less potential to deliver affordable housing than larger sites at Stone. In accordance with the principles of sustainable development, in our view, the proportion of housing provision assigned to Stone must be greater than that assigned to the lower order tiers of the hierarchy, ie to the Key Service Villages and the rest of the Rural Area. Policies must give priority to sustainable locations. Artificially suppressing provision in Stone in favour of more dispersed, less sustainable locations with reduced potential for affordable housing does not provide the required priority. Accordingly, consistent with the principles of sustainable development, we suggest the following distribution of housing in the Borough over the Plan period:- Stafford 72% Stone 17% Key Service Villages 6% Rest of Rural Area 5% This suggested distribution does not mean that no development whatsoever should be directed at the lower parts of the hierarchy. Indeed, strengthening of the rural community can only be achieved in this way; but the relative distribution between the tiers of the hierarchy must, logically, be concentrated towards the top of the hierarchy. Sustainable development principles demand such an approach.

**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 above

*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

**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**

There is evidence to be adduced which requires a level of scrutiny that can only be secured by Examination in Public.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	on behalf of Fradley Estates ( Paul Sharpe Associates on behalf of Fradley Estates)
Comment ID	PS195
Response Date	26/02/13 11:15
Consultation Point	3 SPATIAL PRINCIPLE 3 (SP3) ? STAFFORD BOROUGH SUSTAINABLE SETTLEMENT HIERARCHY ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

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

On behalf of Fradley Estates Limited, the owner of land on the east side of Stone, we raise no objection to the principle of a Sustainable Settlement Hierarchy but rather we object to the way in which housing provision is to be distributed within that hierarchy. By setting a Sustainable Settlement Hierarchy it is incumbent on the Council to utilise and apply that hierarchy in a sustainable and consistent manner in accordance with the advice in NPPF. The Sustainable Settlement Hierarchy is in fact merely a more explicit description of the groupings and informal "hierarchy" of settlements used in the previous Local Plan. However, it is clear that, in the past, that hierarchy has not been applied appropriately in practice



and has led to substantial housing development in less sustainable locations, lower down the settlement hierarchy. In the emerging Plan therefore, consistent with the advice for sustainable development in NPPF, having set a Sustainable Settlement Hierarchy, the Council must give appropriate weight to the relative sustainability of the settlements within that hierarchy. It is not logical to allocate development to locations that are less sustainable while rejecting more sustainable locations higher up the Sustainable Settlement Hierarchy. Indeed, we suggest that to do so would be so in conflict with the logic of sustainable development that, as a result, the Plan would be likely to be found unsound at Examination in Public. This does not mean that no new development whatsoever should be directed towards the lower parts of the hierarchy. Indeed, strengthening of the rural community can only be achieved in this way. However, the relative distribution between the tiers of the hierarchy must, logically, be concentrated towards the top of the hierarchy. Sustainable development principles demand such an approach.

**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 above

*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

**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**

There is evidence to be adduced which requires a level of scrutiny that can only be secured by Examination in Public.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	on behalf of Fradley Estates ( Paul Sharpe Associates on behalf of Fradley Estates)
Comment ID	PS196
Response Date	26/02/13 11:16
Consultation Point	2 SPATIAL PRINCIPLE 2 (SP2) ? STAFFORD BOROUGH HOUSING & EMPLOYMENT REQUIREMENTS ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

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

On behalf of Fradley Estates Limited, the owner of land on the east side of Stone, we object strongly to the proposals for growth and investment in SP2 and its reasoned justification. Put simply, the preferred approach does not flow from the evidence base; is inconsistent with NPPF advice; is inconsistent with the Growth Point concept and, logic dictates, will inevitably lead to the Plan being found "unsound". Whilst acknowledging the Borough Council's long journey in attempting to replace the 2001 Plan with an LDF, adopting a strategy which (mistakenly in our view) is more likely to lead to the early adoption of the Plan is not, of itself, a good reason for choosing that strategy. The NPPF

now calls for a positive approach to planning; to a presumption in favour of sustainable development and it is for the current document to demonstrate the Borough Council's change of attitude and positive approach in producing a proactive document fully embracing the new approach required by NPPF. Unfortunately, the current document; an entirely reactionary document based on "more of the same", merely pays lip service to NPPF and in our view the Plan will be found unsound at Examination in Public. Nowhere in the current document is the concept of Growth Point challenged or repudiated. Indeed the Council remains fully committed to delivering on the concept. On that basis, the Council cannot reasonably suggest "more of the same", ie a continued attempt to deliver 500 dwellings per annum over the Plan period as a "sound" approach. In earlier documents the Council has stated that adoption of a 500 dpa target may be the quickest way to get the Plan adopted. In our view this is a cynical attempt to avoid the need to enhance housing land supply because of poor past performance, ie the target is set deliberately low so that it is easily met and overall development pressures can be minimised. In our view, it is incumbent on the Council to demonstrate its commitment to the Growth Point concept and NPPF para 47 for boosting housing provision. This means that housing supply must be set well above indigenous needs and, in our view, (on the basis of the historic performance of the housing market in the Borough) at somewhere between 600 and 700 dpa. In our view, a target provision of 500 dpa is entirely unambitious; is not consistent with NPPF policy to boost significantly the supply of housing nor consistent with Growth Point strategy because it simply does not cater for a material level of growth. Demonstrably therefore, the strategy cannot and will not provide for the Borough's community.

**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 above

*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

**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**

There is evidence to be adduced which requires a level of scrutiny that can only be secured by Examination in Public.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Creswell Parish Council (Mrs Lisa Horritt)
Comment ID	PS197
Response Date	26/02/13 11:33
Consultation Point	9 POLICY STAFFORD 2 ? NORTH OF STAFFORD ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.2
Files	<a href="#">Creswell Parish Council : SBC Local Plan 2013 - PreSubmission Consultation - Main Body of Response - Feb 2013</a>

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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

- . Positively prepared
- . Justified
- . Effective

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

Initial attempt to load main body of our response as an attachment failed, and so (in accordance with Note 2 of our earlier response - inserted into the main body of "Comments" we now attach the same as a single word document.

*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

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.**

[SBC Local Plan 2013 - Pre-Submission Consultation Response - Feb 2013 - main\\${7627067927539166594}.docx](#)

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Lufton & Assoc's for Wassall family
Comment ID	PS198
Response Date	26/02/13 13:54
Consultation Point	3.14 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

The commitment of the Borough to 'neighbourhood planning' under the provisions of the Localism Act are supported. The Borough Council will need to be mindful that the appropriate bodies, forums and Parishes expedite these plans in conformity with the overall planning strategy. If neighbourhood plans are not forthcoming and fail to deliver provision for housing, employment and retail development the economic prosperity and social cohesion of the Borough could be compromised.

There is support for the instigation of Site Allocation Plans should neighbourhood plans not succeed.

In the case of Great Haywood and Little Haywood and Colwich recent activities of the Parish Council suggest a willingness to engage in 'neighbourhood planning'. Local forums need to be aware that the neighbourhood planning agenda as instigated by the present government is to achieve positive planning to make provision for development and growth.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Lufton & Assoc's for Wassall family
Comment ID	PS199
Response Date	26/02/13 14:04
Consultation Point	4.1 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

The Key Issues and Challenges identified by the Borough Council are generally supported. In particular analysis of the evidence base supporting the Submission Plan would suggest that delivering and appropriate level of new housing in the Borough is critical in meeting the needs and aspirations of the future population.

All other factors being equal the relationship of average household incomes to average house prices in the Borough clearly indicate a need to incrementally increase housing supply. There is a need to recognise the requirements of the whole population and ensure that there is a spatial distribution of new housing provided across the main town of Stafford, Stone and the identified key service villages.

There is strong evidence to indicate that younger families and those on lower than average household incomes have been priced out of the housing market in many of the Borough's villages. There is



evidence that the population in some of the key villages is less representative of the overall population with a concentration in older non-working age groups and those with accumulated property wealth.

The Submission Plan strategy with the focus of the housing provision on three major allocations in Stafford will provide a limited opportunity to increase the offer of affordable housing in the key villages and this is likely to expediate trend of population polarisation.

*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

9 Falmouth Avenue  
Weeping Cross  
Stafford  
ST17 0JQ  
26<sup>th</sup> February 2013

Dear Sirs

The Plan for Stafford Borough - Publication (pre-submission)

I would like to formally object to the part of the above plan which consists of the development at Stafford East of 600 houses.

Both of my daughters live near to the proposed development and having read the "Stafford East - Consultation regarding proposed development" document from Commercial Estates group and First City, I have to say that I am appalled at the scale of the proposed development. This housing development of approximately 600 family homes will, if approved, take place on Greenfield sites on the outskirts of Stafford between the Weston Road and St Thomas' Lane.

It is important that new development meets local needs, whilst protecting and enhancing the existing high quality of life in the Borough and this development proposal for Greenfield sites can never be environmentally acceptable.

The consultation document states that the development will deliver the first phase of the Eastern Access Improvement scheme.

However, Ron Hilton, when Chief Executive at the County Council, has previously been reported in the press as stating that "it was unlikely that the Council would be able to go ahead with the long proposed road to link the A513 at Beaconside to the A449 south of Rickerscote". It would be a very expensive project to link the Weston Road to the Cannock Road because of the cost of building new railway and canal bridges and a viaduct over the rivers and flood plain. The link from the Cannock Road to the Wolverhampton Road would likewise be very expensive as this route is also over a river, flood plain and the canal.

Whether building the Eastern Distributor Road would make any significant difference to the amount of traffic travelling into the centre of Stafford town is debatable as the majority of the shops and three major supermarkets are in the town centre. Also, there is already a fairly effective by pass on the eastern side of town, namely the A51 link from Wolsley Bridges to Stone and the M6 on the Western side.

Your plan states that the East of Stafford development is linked to delivery of Phase 1 of the Eastern Distributor Road from Weston Road / Beaconside to Baswich Lane road bridge at St Thomas' and that this is a key requirement of the Development. However, your plan for development does not show the

Eastern Distributor Road as joining the road bridge at St Thomas'. It shows the original route planned. Which is correct?

You have stated that the local transportation network is important for the day to day access requirements for people in Stafford Borough. Because of the scale of the development that is proposed for the East of Stafford, you have also stated that the Eastern Distributor Road at Stafford, highway construction and access improvement will be necessary to cope with the proposed growth increases.

If building the very small first phase is being used to justify this development, appropriate research should be undertaken to see if traffic would bypass the town or whether it is just accessing the town centre.

Also, there is the potential for increased traffic along Baswich Lane which is unsuitable for the current level of traffic using it and is already heavily congested at peak times in particular. You have stated in the Plan that "A number of improvements have been identified but none considered essential to bring forward development. These comprise: Potential capacity and safety improvements to Baswich Lane (St Thomas' Lane); Baswich Walking and Cycling link over the River Sow". I totally disagree with this comment as the potential for increased usage in Baswich Lane is unsustainable. Also, knowing the area well, I would be most interested to know what improvements could be made to the road network.

The only highway enhancement to overcome capacity constraints in Baswich Lane would be the completion of the Eastern Distributor Road and in view of previous comments from the County Council regarding this road, it should be ascertained whether there is any likelihood of the scheme ever being completed.

You have stated that a key challenge for the Borough will be to deliver the level of growth without compromising the quality of life of the existing residents or the local attractiveness that draws people into the Borough. You are surely aware that this is not deliverable as access to the centre of Stafford town is already abysmal at certain times of day and as the roads can't cope with current volumes of traffic going into the town centre any increased housing development will cause absolute chaos.

Try getting into Stafford from the Weston Road at peak times when the traffic tails back beyond Blackheath Lane and the Lichfield Road already regularly tails back to Lynton Avenue and often to Hillcroft Avenue around 9.00am on weekday mornings. Both of these routes are frequently used by me.

It appears unlikely that any improvement to the roads into the town centre would increase capacity and reduce the current gridlock as all the arterial routes into Stafford meet in the town centre.

You have also stated that proposals that generate significant levels of traffic, which cannot be accommodated in terms of capacity, road safety and load,

will not be permitted. Unless the Eastern Distributor Road is built, which is highly unlikely, this area to the East of Stafford should not be developed.

An “investment into a new half hourly bus service for the site” is rather meaningless as unless the bus route is well supported the service can easily be stopped by the local bus company. This has already happened in other areas. It is also very naïve to think that the Council can “facilitate a modal shift away from the private car” and being so far away from the town centre walking and cycling will not be an option with the majority of people still relying on the private car.

As this planned development is on Greenfield sites, there will be a further decline in the amount and quality of the wildlife asset in the Borough and if this level of building take place, pleasant countryside and the natural environment surrounding Stafford will be drastically reduced, having a dramatic impact on the wildlife and biodiversity of the area. Also, there will be a loss of agricultural land and openness in this area.

Building large numbers of houses on Greenfield sites around Stafford town in particular risks increasing severe flooding because Stafford Borough Council have previously stated that rainwater falling on Greenfield land will infiltrate the ground more effectively than in urban areas

Where green space has already been lost this has contributed to increased flooding in Stafford.

Your POLICY STAFFORD 1 – STAFFORD TOWN conflicts with the individual policies for development as you state that “The strategy will continue to meet the housing requirements for Stafford Town by providing 5,500 new homes, including additional provision for Ministry of Defence personnel”

This figure of 5,500 is totally misleading as the individual proposed developments add up to approximately 6,300 new homes!

North	3,100
West	2,200
East	600
MOD	400

Finally, I have chosen to challenge the Plan for the East of Stafford by letter as to complete your online consultation would have taken far too long and I would have been repeating the same comments in many areas.

Yours faithfully

Mrs A Crane



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

Ref:

**Representations Form**

**(For official  
use only)**

**Please return completed forms to:**

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

**Responses must be received by 12 noon on Thursday 28<sup>th</sup> February 2013**

**This form has two parts:**

**Part A:** Personal Details

**Part B:** Your representations.

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

# Part A

## I. Personal Details\*

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

## 2. Agent's Details (if applicable)

Title	MR	
First Name	JONATHAN	
Last Name	HEAL	
Job Title (if applicable)		
Organisation (if applicable)		
Address Line 1	11 KING'S AVENUE	
Address Line 2	STONE	
Address Line 3	STAFFORDSHIRE	
Address Line 4		
Postcode	ST15 8HD	
Telephone Number	01785 811094	
E-mail address	jhalleyes@hotmail.com	

## Part B – Please use a separate sheet for each representation

Name or Organisation	
----------------------	--

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

e.g. Policy Reference, Paragraph, Map title	Plans for Stone esp plans to change the designation of Westbridge Park from a Leisure activity Area to “ Mixed Uses” which will include a supermarket, referred to in Section 8.1 POLICY – STONE TOWN CENTRE
---	--

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

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

- a. **Legally compliant\*?**  
 Yes  No  No opinion as yet
- b. **Sound\*?**  
 Yes  No  for reasons below

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

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

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

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

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

Re : 8.1 Stone policy **a** : Encourage the Development and expansion of the town centre to provide a vibrant place where people can meet, shop, eat and spend leisure time in a safe and pleasant environment **including provision of mixed use development at Westbridge Park**

Stafford Borough Council have chosen to include this because they have already been

negotiating with a developer to build a supermarket on the site. They have plans to sell off a large section of the Park so that its value as a green open space as a place to **spend leisure time in a safe and pleasant environment** will be permanently damaged, unless the only leisure activity worth considering is shopping! (see 8.1 policy a). There has been an unwholesome level of secrecy about this proposal until very recently, but the public exhibition on it does not take place in Stone itself until just after the consultation period on the Borough Plan closes. There has been a serious lack of openness and public consultation on a plan to reduce the area of the most significant Green Open Space in the Stone Town Centre. Whether this is legal or not is for others to comment upon. At the public meeting on November 20<sup>th</sup> called to discuss the Borough Plan, to which several hundred people came, no mention was made of the supermarket plans until after repeated questioning from the floor. The Council Leader was then forced to admit that discussions had taken place. In fact these could be so advanced, he implied, that it might be difficult to go back on any agreements made. It may be legal, but there was a marked lack of democratic accountability in such private negotiations.

In Section 8.6 Stafford BC talk of developing Westbridge Park as a canal and riverside park, whilst they are planning to sell off much of the land by the canal for the building of a supermarket and using a large amount of the available site as a car park. These policies are inconsistent. You can't do both! They will also have the option under the term "mixed use development" to sell off more land for other uses when people find the remaining park is inadequate for the uses to which it is now put eg outdoor sports, Stone Food & Drink festival.

In 8.1 policies SBC talk of enhancing sporting facilities and of adequate provision of open space, but at the same time they have plans to cut the open space in Westbridge Park (because of the size of the planned car park) so that the football pitches need to be realigned as the only way they can still fit in.

SBC talk about enhancing public spaces and give praise to the Stone Food & Drink festival in bringing people into town, yet the plans to reduce the area for events available in the park (reduce by about 30%?) means that future events cannot happen on the same scale. SBC talk about habitat creation when a significant canal-side area suitable for habitat creation will be sold off to a developer. The back of a supermarket is not going to be rich in biodiversity of the right kind. A lot of the current green open space will be car park. "Mixed Use" does not allow other policies to be meaningful. It means they share the space with shopping. This all makes nonsense of the policy for a "high quality strategic network of accessible green space". I have heard nothing of such plans and in this part of Stone a supermarket or other similar development would prevent a high quality open space happening. The policies are inconsistent with each other.

Flood Risk : SBC acknowledge that Westbridge Park is a low-lying area situated between the Trent & Mersey Canal and the River Trent. It is a flood risk area. Section 8.8 states: "No new development should take place on low lying land adjacent to the River Trent..." Westbridge Park is low lying land adjacent to the River Trent. The risks have been obvious in recent months. On several occasions parts of the park have been under water. The effect of having a large car park between these two water flows, increasing the rate of water run off, will exacerbate the flooding issues that arise now. There is no solution



provided to the flooding risk. Details of discussions with relevant professionals have not been released. The Flood Risk survey in 2008 did state that there was a presumption against any more development in the Flood Risk zone. The current proposal needs to be tested against National guidelines. These are being strengthened because of recent flooding events which are predicted to be more frequent and more severe if Climate Change trends continue.

Evidence for Need (Section 8.13) ; I have looked at the evidence for they “need” for another supermarket in the town . SBC use a peculiar concept of “overtrading” to justify the sale of public open space and leisure facilities. High Street traders, already under pressure from the competition from Morrisons would not see it that way. There are several empty premises in the High Street now. Many people drive to Morrisons, just outside the town centre core and separated by a busy road, park, shop and go on elsewhere. The same would happen with a large shop at Westbridge Park. It is unlikely to increase footfall in the High Street and would be a direct competitor to local businesses. There is already a supermarket in the High street, but the Cooperative Food store, though it trades reasonably, is never anywhere near “overtrading”. This suggests there is no need for an additional store of that kind. The presence of another supermarket at Westbridge Park would be inconsistent with the stated policy of “encouraging a greater diversity of local traders” (see section 8.1 policy d). Some will be forced out of business. The Retail Model used to justify development is an odd one. While it may be the case that you can predict an increase in expenditure on food when there is an economic upturn, the model used equates expenditure to consumption. I think this means that we will all need to eat more to make the Retail Model work. In any case, the economic model and predicted growth in trading are probably erroneous as the expected upturn in the economy continues to be postponed.

Section 8.14 is now incorrect, surely, now that SBC have identified the site they want to have for a supermarket.

At the Public Meeting in November, both councillors and paid officers tried to persuade the large number of residents there that “Mixed Use Development” was no threat to the park. They were evasive about negotiations with food retailers and only gave details in the second half of the meeting after repeated questioning. They said there was no threat to the park, but there is nothing in the SBC plan to maintain green open spaces and facilities for outdoor sports and other events. Whatever they had said previously, plans to sell off a lot of the park had been going on without being details being revealed.

Now though, SBC have just issued a leaflet on their supermarket plan. It contains Artists’ Impressions that are inconsistent with the maps included. The pictures given are dishonest if the maps are accurate. The illustrations show green open areas where there will be car parks. It shows the supermarket in the wrong position and much smaller than it would appear from the position of the illustration. The supermarket plan is now up for discussion, but the exhibition only comes to Stone after this consultation on the Borough Plan has closed, Thursday 28<sup>th</sup> February.

I have lived I Stone since 1996 and worked in Stone since 1988 and I oppose any change

of use for Westbridge Park, or any suggestion that it is appropriate to have a shopping development on the park. I also oppose a local council selling off part of a local park when several thousand people in Stone have already signed a petition against it.

(attach separate sheets as necessary)

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

### **Section 8.1 The proposal for mixed use development on Westbridge Park should be removed completely.**

**There should be no scope for selling park land and building a supermarket.**

All information on the risks of flooding in the flood plain at Westbridge Park should be made available before any sort of new development at all is allowed in this part of Stone – as the Borough Plan makes clear elsewhere!

SBC need to withdraw the leaflet they have recently issued to residents which proposes a supermarket because this gives inaccurate/dishonest illustrations of the visual impact of the supermarket and the amount of Open Space that will be left. I base this comment on the map in the same leaflet.

(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**

This issue is so serious for the town of Stone that you need to hear many opinions to cover what has been said in the town. Obviously if a large number of people are offering to say exactly the same, we do not all need to contribute independently.

However there is also the issue of democratic accountability. Thousands of people in Stone have already expressed their opinions, and hundreds attended a public meeting , most of them opposing the plan for a supermarket on Westbridge Park. However Stafford Borough Council have so far chosen to ignore these representations. This proposal cannot be presented as what the people of Stone require.

(attach separate sheets as necessary)

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

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

## **Representation Form Guidance Notes**



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

### **Representations should therefore focus on legal compliance and soundness.**

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

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

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

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

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

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

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	J Ross Developments (Mr Nick Scott)
<b>Comment ID</b>	PS203
<b>Response Date</b>	26/02/13 18:50
<b>Consultation Point</b>	3.11 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

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

Previous comments with regards to the post WMRSS apply. What issues does the abolition of the RSS generate and how may the Local Plan be changed to reflect this? Not all authorities are taking the view that their Plans need to be in compliance with regional strategies. Either there is agreement between the 'cross-boundary' authorities to maintain the last regional strategy, in which case an explanation as to how this has been consulted upon needs to be given in the context of locally derived targets or how targets are to be reassesses should be stated. There is something deeply unsatisfactory in maintaining compliance with a regional strategy that will have no bearing by the time that the Local Plan process is completed. This does not appear to be a sound basis for the Plan.

**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.**

This issue requires a much clearer explanation

*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

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	A new leisure centre for westbridge park ( )
<b>Comment ID</b>	PS204
<b>Response Date</b>	26/02/13 20:39
<b>Consultation Point</b>	12 POLICY STONE 1 ? STONE TOWN ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

We fully support the mixed use allocation at Westbridge Park and believe this is a chance that should be grasped with both hands as an opportunity to improve the existing leisure/health facilities in the town and the retail offer.

By locating the new leisure facilities close to the heart of the town we feel that this will increase new participation and thus encourage a healthier lifestyle. We are also in favour of the location of a foodstore at Westbridge Park because it should help to increase footfall into the town centre through facilitating and encouraging linked trips (as shown in the recent comment and independent evidence submitted on behalf of morrisons in this plan)

Notwithstanding the above, since the plans were first announced we have seen some dilution of the mentioned scheme by some elements not been included on the latest plans, these include a kiosk/refreshment facility and public toilets. We appreciate that the plans are still indicative, however we would like some assurances that these facilities will form part of the Westbridge Park proposals because this will enable families and tourists to enjoy the facilities in the area and should ensure that they use the park for longer periods. By not having refreshment facilities on site we feel that the council is potentially missing out on additional revenue.

It should also provide a first point of call should minor first aid be required for the inevitable bumps and scrapes that will occur. In order to maximise the unique potential that Westbridge Park has we feel strongly that these facilities should be provided.

We do not wish to see the scheme diluted further as this will give the impression that Stone is the poor relation of Stafford.

In order for this to be avoided we wish to see up to date equipment installed to the same specifications, and preferably better than Staffords Victoria Park!

With this in mind we also wish to see full local group participation involving the youth of Stone having a say in all aspects of the park. (design/layout/equipment)

By doing this we firmly believe that this will have the benefits of empowerment and a sense of ownership of the area which will in turn discourage vandalism and inappropriate behavior. This could further be enhanced by involving the local PCSO's to help oversee this and build vital bridges and contacts which can only serve the community well going forward.

It was previously suggested that Westbridge Park would provide a combined doctors practice and health centre, however this is now in the balance as people are seeking the removal of the terms mixed use **development** which would allow for new health facilities to be built on the preferred site. As such we would like reassurances that it is still the Council's objective to provide a much needed facility in Stone. We would also like to see a list of potential sites earmarked for this.

In recent questions to the local CCG it was revealed that both current doctors practices are above the national average for doctor/patient ratios (1/1582) yet Mansion House Surgery is 1/1666 and Cumberland House is currently at 1/2223 and with the rapid growth in the town over the last 20 years (15.8% between 1991/2001 and potentially 15%+ increase in the last census) we feel any future housing developments must take into consideration the strain the health infrastructure is currently under and significant S106 funds should be directed to it.

***However the Borough Council should not rely on developers to fund much needed improvements to the existing health provision because it is not their responsibility to mitigate existing problems or meet organic population increases .***

We would also like reassurances about the existing school provision in Stone. With the rapid growth in Stone what considerations will be made with regards to the existing schools as there are only so many mobile classrooms that can be erected on site and perhaps further provision should be made for new permanent structures on sites and considerations made regarding Allyn's Secondary School, the only state secondary school in town.

*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

**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**

As a representative of a group of like minded people totalling over 200 likers on our social media page on facebook who wish to see improvements to the towns leisure and tourism aspects.

We wish to participate in the examination to offer a balance to the debate based on evidence and facts, which have led us to the conclusion that this development would be a key driver in moving the town forward for the future.

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	Harrowby Estates ( Strutt and Parker on behalf of)
<b>Comment ID</b>	PS205
<b>Response Date</b>	26/02/13 21:21
<b>Consultation Point</b>	3.14 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Harrowby Estates ( Strutt and Parker on behalf of)
Comment ID	PS206
Response Date	26/02/13 21:28
Consultation Point	5.1 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

**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.**

Provide for local needs in the Borough's villages should not just relate to the provision of affordable housing. The smaller villages in the Borough particularly those with facilities such as shops and pubs should be allowed to grow if suitable sustainable sites exist

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Harrowby Estates ( Strutt and Parker on behalf of)
Comment ID	PS207
Response Date	26/02/13 21:36
Consultation Point	5.2 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

**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.**

We support item 21 below and this should include all villages in the Borough not just key service villages, but villages with services and good transport links with Stafford such as Sandon

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Harrowby Estates ( Strutt and Parker on behalf of)
Comment ID	PS208
Response Date	26/02/13 21:38
Consultation Point	6 SPATIAL PRINCIPLE 6 (SP6) ? ACHIEVING RURAL SUSTAINABILITY ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

**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.**

Rural sustainability means many different things, but it includes employment and the re-use of agricultural buildings and even new buildings to provide rural employment opportunities, which is vital to the rural parts of the Borough.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Harrowby Estates ( Strutt and Parker on behalf of)
Comment ID	PS209
Response Date	26/02/13 21:40
Consultation Point	14 Policy E1 ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

**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 recognition of the need for transport links to provide rural employment is welcomed and supported

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	National Federation of Gypsy Liaison Groups (Mr A YARWOOD)
Comment ID	PS210
Response Date	27/02/13 09:12
Consultation Point	3.5 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Consistent with national policy

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

The pan fails to acknowledge National planning policy as set out in DCLG publication Planning Policy for Traveller Sites

**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.**

Include reference to Planning Policy for Traveller Sites

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	National Federation of Gypsy Liaison Groups (Mr A YARWOOD)
Comment ID	PS211
Response Date	27/02/13 09:13
Consultation Point	28 Policy C5 ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

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

Residential development is a term which includes residential caravans and thus Gypsy and Traveller pitches. It is unreasonable to apply this policy to such sites. It would be contrary to National guidance.

**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.**

Make clear this policy does not apply to Traveller sites

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	National Federation of Gypsy Liaison Groups (Mr A YARWOOD)
Comment ID	PS212
Response Date	27/02/13 09:14
Consultation Point	22 Policy T1 ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Justified

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

Requirement (b) is not justified. Some developments clearly do not need Transport Asserssments orTravel Plans. This requirement should only apply to developments generating significant levels of traffic.

**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.**

Add the words "generating significant levels of traffic" after "developments" in paragraph (b)

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	National Federation of Gypsy Liaison Groups (Mr A YARWOOD)
Comment ID	PS213
Response Date	27/02/13 09:14
Consultation Point	29 Policy C6 ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.5

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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

This policy is supported but criteria g is inappropriate for a Traveller site

**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.**

delete criteria g

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	National Federation of Gypsy Liaison Groups (Mr A YARWOOD)
Comment ID	PS214
Response Date	27/02/13 09:15
Consultation Point	32 Policy N2 ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Justified  
. Effective

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

It would be unreasonable to apply the "sustainable Construction" requirements to residential caravans. This would make provision for Gypsies and Travellers virtually impossible.

**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.**

Apply the "sustainable Construction" requirements only to built housing development

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	National Federation of Gypsy Liaison Groups (Mr A YARWOOD)
Comment ID	PS215
Response Date	27/02/13 09:15
Consultation Point	36 Policy N6 ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Justified  
. Effective

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

It is wholly unrealistic to set a 12 mile limit. No development over 1 mile can have any impact.

**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.**

reduce 12 miles to a maximum of 1 mile

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	National Federation of Gypsy Liaison Groups (Mr A YARWOOD)
Comment ID	PS216
Response Date	27/02/13 09:15
Consultation Point	38 Policy N8 ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

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

It is unrealistic to apply the requirement set out in the final paragraph to Gypsy sites. This would virtually prevent any Gypsy and Traveller site provision

**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.**

Apply the final; paragraph only to "New buildings", not to "New development"

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Lufton & Assoc's for Wassall family
Comment ID	PS217
Response Date	27/02/13 10:14
Consultation Point	5.2 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

The key objectives are supported in particular points 21, 22 and 25. In relation to key objective 25 the recognition that the provision of open market and affordable housing in the Key Service Villages in supporting viable, sustainable and prosperous rural communities is supported.

*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?**

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

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Lufton & Assoc's for Wassall family
Comment ID	PS218
Response Date	27/02/13 10:16
Consultation Point	1 SPATIAL PRINCIPLE 1 (SP1) - PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

The recognition of the National Planning Policy Framework and the presumption in favour of sustainable development is welcomed. This central tenet of national planning policy is recognised by the government as vital in assisting to ensure that the planning system contributes to rather than frustrates the provision of sustainable communities and economic prosperity.

The New Homes Bonus will be an important contributor to local government finance and it and the community facilities that can be legitimately secured through s.106 agreements and/or CIL are significant incentives to local planning authorities.

The government strongly supports local authorities that recognise the housing needs of their communities and the need to bridge the gross under-provision of new homes to meet demand over

the last two decades that has contributed to an affordability crisis with many young families being priced out of the housing market in the long term. One solution among others is to ensure that the planning system provides an adequate supply of good and deliverable sites for new residential development.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Lufton & Assoc's for Wassall family
Comment ID	PS219
Response Date	27/02/13 10:18
Consultation Point	3 SPATIAL PRINCIPLE 3 (SP3) ? STAFFORD BOROUGH SUSTAINABLE SETTLEMENT HIERARCHY ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

This principle of the settlement hierarchy is generally supported. It is agreed that housing and employment growth should be balanced and that the strategy should as far possible provide the conditions to develop the Borough to allow for a high degree of self-containment in terms of housing, employment, schools and other education facilities while offering the population housing choice. The recognition of Great Haywood as a Key Service Village is welcomed.

It is noted that the Borough Council revised the 'Settlement Assessment of Services and Facilities' in May 2012. Great Haywood has some key services that contribute to self-containment and the close proximity to Little Haywood and Colwich provides further facilities and choice of services. Great Haywood has two successful and vital primary schools and two medical practices, additional housing development could help to retain and improve these facilities.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Lufton & Assoc's for Wassall family
Comment ID	PS220
Response Date	27/02/13 10:20
Consultation Point	6.31 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

The recognition of Great Haywood as a Key Service Village is welcomed and supported. Great Haywood with the close proximity of Little Haywood and Colwich together provide a range of community facilities and services. Although, the villages lack significant local employment opportunities they are within a short commuting distance of both Stafford and Rugeley.

Great Haywood has two successful and vital primary schools (St. Johns and Anson CE) and two medical practices, additional housing development could help to retain and improve these facilities. It is considered that on the basis of population size, the presence of critical facilities that contribute to sustainable communities (schools and medical facilities) Great Haywood should be regarded as suitable for a modest housing allocation.

In terms of possible directions for a sustainable extension to Great Haywood it should be recognised that there are number of significant planning constraints. The A51 is a significant presence to the east

of the village and has served as a strong defensible development boundary. To the west of the village the edge of Cannock Chase AONB which follows the line of Main Road and the West Coast Mainline defines a clear boundary.

Any development south of Great Haywood would encroach onto Little Haywood and the two villages could become a single more characteristically urban settlement. The landscape between Great and Little Haywood is recognised in Staffordshire County Councils recent historic landscape assessment supporting the Submission Plan as of 'high sensitivity' where there is strong retained evidence of piecemeal enclosure.

Development north of the village would appear the most logical in terms of accessibility, sustainability and planning criteria. Any development allocation north of the village could also assist with potential physical and landscape mitigation for the planned HS2 rail alignment to the benefit of the wider community.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Lufton & Assoc's for Wassall family
Comment ID	PS221
Response Date	27/02/13 10:21
Consultation Point	6.41 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

Past development rates in the some of the rural parts of the Borough and in the Key Service Villages have been demonstrably more successful than in Stafford town. This is in a period when considerable public investment has been made in the County town to provide infrastructure and support the town centre. Much of the recent housing development in the town has been supported by regeneration initiatives and large scale public investment. Housing development in Stafford has provided a negligible and in many cases no contribution to affordable housing and other social infrastructure. It is considered that there is again significant risk to the delivery of housing in Stafford with reliance on three strategic locations particularly in relation to mitigating the impact on the highway network and providing funding for adequate education facilities. The Boroughs work on the viability of infrastructure to support major development could not be interpreted to conclude that this strategy will be effective in delivering for future housing and employment 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?** Yes, I wish to participate at the examination in public

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Lufton & Assoc's for Wassall family
Comment ID	PS222
Response Date	27/02/13 10:22
Consultation Point	7 SPATIAL PRINCIPLE 7 (SP7) ? SUPPORTING THE LOCATION OF NEW DEVELOPMENT ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

The principles outlined in the policy are supported.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Lufton & Assoc's for Wassall family
Comment ID	PS223
Response Date	27/02/13 10:25
Consultation Point	8 POLICY STAFFORD 1 ? STAFFORD TOWN ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Justified  
. Effective

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

The focus of the substantial majority of housing development in the Borough in three strategic locations in Stafford town is not supported. The evidence base and in particular the Borough Councils Sustainability Appraisal and the Habitats Regulation Assessment cannot be taken to reasonably conclude that focussing major development in only three main locations was the optimal strategy in terms of key regeneration, sustainability and planning objectives. There is a significant risk to the delivery of housing with reliance on these limited strategic locations particularly in relation to mitigating the impact on the highway network and providing funding for adequate education facilities. The Boroughs work on the viability of infrastructure to support major development could not be interpreted to conclude that this strategy will be effective in delivering for future housing and employment need.

There is limited information in the plan and supporting evidence (including the Colin Buchanan Infrastructure Delivery Plan report, July 2012) to suggest that funding and delivery mechanisms for

the Western Access Improvement Scheme or the Eastern Access Improvement Scheme are secure. It is further noted that the traffic modelling for the North of Stafford has been predicated on an allocation of 2,000 dwellings and not 3,100 dwellings as now proposed.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Lufton & Assoc's for Wassall family
Comment ID	PS224
Response Date	27/02/13 10:28
Consultation Point	9 POLICY STAFFORD 2 ? NORTH OF STAFFORD ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

- . Positively prepared
- . Justified
- . Effective

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

The Borough Council is relying on a single allocation to the North of Stafford to deliver over two-fifths (43%) of the housing allocation for the whole town until 2031. There is no clear evidence to show that this allocation is viable and it is a high risk strategy to rely on such significant development in one location where housing delivery can be controlled by the landowner or a developer consortia.

The access and transport strategy relating to the delivery of the major strategic development allocation North of Stafford is not clearly defined or consistent with a robust delivery mechanism. There is little evidence to suggest that adequate transport modelling has been done to assess the impact of the housing and employment allocations on the highway network. The Colin Buchanan Infrastructure Delivery Plan report, July 2012, indicates that the allocation North of Stafford has been predicated on an allocation of 2,000 dwellings and not 3,100 dwellings as now proposed.

The Strategy for the development North of Stafford appears to indicate that the Borough is planning for an independent community rather than a development that will integrate with and be part of Stafford town. This vision is amplified by the location north of Beaconside beyond the ring-road which has provided a defensible and obvious boundary for the town for more than three decades.

The existing employment development at Redhill is very poorly integrated with the town and lacks any obvious visible, transport or geographic references that suggest it is part of Stafford town. This is further amplified by the very distant main access to the site which is 300-400m north off the A34.

The north of Stafford allocation represents a very significant incursion into open countryside and lacks clearly defensible development boundaries to the north and east. The impact of development here will be visually highly intrusive in the open landscape north of town.

The Initial Preferred Route for HS2 Phase 2 to Manchester is shown to pass within less than 200 metres of the northern boundary of the North of Stafford strategic allocation.

The Adopted Stafford Borough Local Plan Proposals Plan very clearly shows that land to the south of Marstongate Farm is an area of significant biological importance. This land provides a green lung for the town and should be regarded as a critical element of green infrastructure linking with Stafford Common and open land to the south of Beaconside.

A much more concerted effort should be made to protect this land from development and enhance the ecological and biological linkages across the ring road. Marston Brook is a natural water corridor to the east of Marston Lane which by the redrawing of the allocation boundary in the plan submission process has been incorporated into the strategic development allocation. The enlargement of the strategic allocation boundaries North of Stafford both east and west of Marston Brook and the considerable encroachment into the area of biological importance gives the community of Stafford no confidence that the Borough Council has properly considered how this development should be assimilated into its natural surroundings.

It is recommended that scale the development allocation North of Stafford should be substantially reduced to between 1,500 to 2,000 dwellings and incorporate mitigation measures to reflect the biological importance of the site and its wider linkages. It is suggested an area of biological enhancement should be indicated on both sides of Marston Brook and an area for environmental improvement and recreation be identified to separate the allocated development areas by a minimum of 300m.

**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.**

Reduce the scale the development allocation North of Stafford to 1,500 to 2,000 dwellings and incorporate mitigation measures to limit the impact of the proximity to the Preferred HS2 line with consequential amendment to the supporting text and justification.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Lufton & Assoc's for Wassall family
Comment ID	PS225
Response Date	27/02/13 10:30
Consultation Point	10 POLICY STAFFORD 3 ? WEST OF STAFFORD ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

- . Positively prepared
- . Justified
- . Effective

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

There is limited information in the plan and supporting evidence (including the Colin Buchanan Infrastructure Delivery Plan report, July 2012) to suggest that funding and delivery mechanisms for the Western Access Improvement Scheme are robust and secure. It is clear capital funding towards the Western Access Improvement Scheme has been rejected by government most recently under a major scheme bid to DfT at a time when the Borough was receiving considerable additional funding for infrastructure from DCLG with the town recognised as a 'growth point'. Without a much more robust funding mechanism being identified or a much greater contribution being secured from the developer it is difficult to envisage how the Western Access Improvement Scheme can be delivered and over what time period.

At the best it would appear that development west of Stafford should only be recognised as viable later in the plan period and beyond 2021 at the earliest.

The policy under point xiii only refers to the delivery of phase 1 of Western Access Improvement Scheme whereas in other documents and in policy 1 Stafford Town it is clear the Borough Council is committed to a wider highway improvement scheme. Apart from allowing immediate access to the major site it is difficult to assess what phase 1 of the Western Access Improvement Scheme could achieve in isolation. It does not appear to contribute to any wider transport strategy that would be of benefit to the circulation of traffic in the town or the possibility of removing traffic from the town centre.

At the best it would appear that development west of Stafford should only be recognised as viable later in the plan period and beyond 2021 at the earliest.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Lufton & Assoc's for Wassall family
Comment ID	PS226
Response Date	27/02/13 10:45
Consultation Point	7.28 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

- . Positively prepared
- . Justified
- . Effective

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

The Borough Council is relying on a single allocation to the North of Stafford to deliver over two-fifths (43%) of the housing allocation for the whole town until 2031. There is no clear evidence to show that this allocation is viable and it is a high risk strategy to rely on such significant development in one location where housing delivery can be controlled by the landowner or a developer consortia. The access and transport strategy relating to the delivery of the major strategic development allocation North of Stafford is not clearly defined or consistent with a robust delivery mechanism. There is little evidence to suggest that adequate transport modelling has been done to assess the impact of the housing and employment allocations on the highway network. The Colin Buchanan Infrastructure Delivery Plan report, July 2012, indicates that the allocation North of Stafford has been predicated on an allocation of 2,000 dwellings and not 3,100 dwellings as now proposed. The Strategy for the development North of Stafford appears to indicate that the Borough is planning for an independent

community rather than a development that will integrate with and be part of Stafford town. This vision is amplified by the location north of Beaconside beyond the ring-road which has provided a defensible and obvious boundary for the town for more than three decades.

The existing employment development at Redhill is very poorly integrated with the town and lacks any obvious visible, transport or geographic references that suggest it is part of Stafford town. This is further amplified by the very distant main access to the site which is 300-400m north off the A34.

The north of Stafford allocation represents a very significant incursion into open countryside and lacks clearly defensible development boundaries to the north and east. The impact of development here will be visually highly intrusive in the open landscape north of town.

The Initial Preferred Route for HS2 Phase 2 to Manchester is shown to pass within less than 200 metres of the northern boundary of the North of Stafford strategic allocation.

The Adopted Stafford Borough Local Plan Proposals Plan very clearly shows that land to the south of Marstongate Farm is an area of significant biological importance. This land provides a green lung for the town and should be regarded as a critical element of green infrastructure linking with Stafford Common and open land to the south of Beaconside.

A much more concerted effort should be made to protect this land from development and enhance the ecological and biological linkages across the ring road. Marston Brook is a natural water corridor to the east of Marston Lane which by the redrawing of the allocation boundary in the plan submission process has been incorporated into the strategic development allocation. The enlargement of the strategic allocation boundaries North of Stafford both east and west of Marston Brook and the considerable encroachment into the area of biological importance gives the community of Stafford no confidence that the Borough Council has properly considered how this development should be assimilated into its natural surroundings.

**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.**

Reduce the scale the development allocation North of Stafford to 1,500 to 2,000 dwellings and incorporate mitigation measures to limit the impact of the proximity to the Preferred HS2 line with consequential amendment to the supporting text and justification. Incorporate mitigation measures to reflect the biological importance of the site and its wider linkages. It is suggested an area of biological enhancement should be indicated on both sides of Marston Brook and an area for environmental improvement and recreation be identified to separate the allocated development areas by a minimum of 300m.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Fulford Parish Council (Mr Stephen Beck)
Comment ID	PS227
Response Date	27/02/13 11:38
Consultation Point	12 POLICY STONE 1 ? STONE TOWN ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Justified

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

Fulford Parish Council does not believe there is a need for a further large retail outlet in Stone. The main high street is already struggling with a several empty premises and several charity shops.

The need increased and better sports facilities is necessary not only for Stone itself, but also for the surrounding areas, including the residents of Fulford parish. However the parish council do not believe that providing a 'mixed use development' on Westbridge Park is the answer. In fact the document at 8.6 recognises Westbridge Park as a 'valuable recreational space for indoor and outdoor events'. It also states at 8.8 that 'no new development should take place on low lying land adjacent to the river Trent'.

**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 wording 'including provision of mixed use development at Westbridge Park@ should be removed.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	J Ross Developments (Mr Nick Scott)
Comment ID	PS228
Response Date	27/02/13 11:52
Consultation Point	6.3 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

We welcome this positive approach.

*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



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

Ref:

**Representations Form**

**(For official  
use only)**

**Please return completed forms to:**

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

**Responses must be received by 12 noon on Thursday 28<sup>th</sup> February 2013**

**This form has two parts:**

**Part A:** Personal Details

**Part B:** Your representations.

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



## Part A

### 1. Personal Details\*

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

### 2. Agent's Details (if applicable)

Title	Mr	
First Name	Philip G.	
Last Name	Sharpe	
Job Title (if applicable)	Planning Officer	
Organisation (if applicable)	Inland Waterways Association, Lichfield Branch	
Address Line 1	34 Old Eaton Road	
Address Line 2	Rugeley	
Address Line 3	Staffs.	
Address Line 4		
Postcode	WS15 2EZ	
Telephone Number	01889 58333	
E-mail address	philip.g.sharpe@ntlworld.com	

## Part B – Please use a separate sheet for each representation

Name or Organisation	Inland Waterways Association, Lichfield Branch
----------------------	--

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

---

e.g. Policy Reference, Paragraph, Map title	Policy E7 Canal Facilities and New Marinas
---	--

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

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

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

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

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

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

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

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

The Inland Waterways Association (and British Waterways) commented on policies CP22 Tourism and DMP23 Canal Facilities and New Marinas in the Publication Draft Plan in 2011, resulting in changes being agreed. The amended policies E6 Tourism and E7 Canal Facilities and New Marinas in the Publication Plan are acceptable, but with one exception. Policy E7 introduces a new condition on the provision of marinas and moorings away from settlements that:

h. There are no permanent moorings for residential purposes.

IWA considers that this restriction is not justified, cannot be effectively enforced, and is inconsistent with national policy. Further explanation of these matters of soundness is attached.

(attach separate sheets as necessary)

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

Policy E7 Canal Facilities and New Marinas, condition h, should be amended to:  
 h. There are a limited number of permanent moorings for residential purposes, appropriate to the

location.

Further explanation of how this change would make the Plan 'sound' is attached.

(attach separate sheets as necessary)

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

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

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

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

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

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

The Inspector may not be familiar with the use of canal boat moorings for residential purposes and may wish to seek further clarification or information relevant to this issue.

(attach separate sheets as necessary)

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

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

## **THE PLAN FOR STAFFORD BOROUGH – PUBLICATION (PRE-SUBMISSION)**

### **INLAND WATERWAYS ASSOCIATION (LICHFIELD BRANCH)**

#### Representations Form – Supplementary Sheets

The Inland Waterways Association (IWA) is a national charity which campaigns for the conservation, use, maintenance, restoration and development of the inland waterways for public benefit. The Lichfield Branch of IWA covers Stafford Borough, along with parts of the Stoke on Trent Branch and the Shrewsbury & North Wales Branch.

#### **Policy E7 Canal Facilities and New Marinas**

Away from settlements in the settlement hierarchy, marinas and moorings with limited service facilities will be accepted provided: ...

#### **h. There are no permanent moorings for residential purposes.**

This part of the Plan is considered to be unsound because it is not Justified, Effective, or Consistent with National Policy.

#### **Part B 6. Soundness**

##### Summary:

The Inland Waterways Association (and British Waterways) commented on policies CP22 Tourism and DMP23 Canal Facilities and New Marinas in the Publication Draft Plan in 2011, resulting in changes being agreed. The amended policies E6 Tourism and E7 Canal Facilities and New Marinas in the Publication Plan are acceptable, but with one exception. Policy E7 introduces a new condition on the provision of marinas and moorings away from settlements that:

h. There are no permanent moorings for residential purposes.

IWA considers that this restriction is not justified, cannot be effectively enforced, and is inconsistent with national policy.

##### Further explanation:

The canals within Stafford Borough, and all adjoining authorities, are of 'narrowboat' dimensions, accommodating boats with a maximum width of 7 feet, length of 72 feet, and up to 7 feet in height above the water level. This representation relates to such narrowboats which are capable of navigation, and not to any fixed 'houseboat' structures with oversize dimensions and no engines, akin to floating chalets, of which there are no known examples locally and to which entirely separate criteria should apply.

The historic canal system is nowadays used largely for recreation and the majority of canal boats are purpose built to provide short or long term residential accommodation with full modern facilities. Canal boats are used in a variety of ways, from day trips, weekends, and a few weeks' holiday cruises a year through to extended seasonal voyages and continuous cruising. Boat users' circumstances change, and

individual moorings may be occupied for a variety of residential uses; permanent, seasonal, temporary or intermittent and which vary over time.

Boat owners and users come from a broad cross section of society and those living permanently or semi-permanently afloat may do so as an extended vacation, as a lifestyle choice, or for employment related reasons. Some are specifically licenced by the Canal & River Trust as 'Continuous Cruisers' which means they should spend no more than 14 days moored in any one place, except where navigation is restricted over the winter period by maintenance work and/or short term mooring arrangements have been made. At the other end of the scale some boat residents choose or need to remain largely or permanently in one location for family, social, employment, medical or other reasons.

Mooring locations may be in urban, village or rural areas and range from registered residential berths in fully serviced marinas through to 'linear' moorings along the towpath side or offside of the canal with limited or no on-site facilities. Most boats need to move regularly, if only short distances, to access water points, sanitary stations or boat yards for other supplies and maintenance.

The external appearance of canal boats used as permanent residences often differs little, if at all, from those used intermittently. There may be a winter supply of logs on the roof or other indications to those familiar with boats but to the general public the differences are marginal. Therefore any policy based on an assumed greater visual impact by residential boats is mistaken. It is accepted that with a small minority of residential boat there may be some extension of the occupation area with gardens, sheds, animals, equipment, vehicles, etc. onto adjoining land, but existing planning powers are usually sufficient to prevent or limit this from becoming intrusive. Moreover, these occurrences are invariably at sites outside new marinas, within which standards are generally rigorously controlled.

Residential boats also confer several benefits. The presence of occupied boats on moorings improves their supervision, with increased boat and boatyard security and crime prevention (See reference 1). Residential boats also make a small but useful contribution to the provision of affordable housing (2).

The licensing, mooring and control of boats is the responsibility of the Canal & River Trust (formerly British Waterways) and subject to their byelaws, boat safety scheme inspections, and other regulation. It lies largely outside the remit of local authorities except where planning consent for new marinas or facilities buildings is required, or Conservation Area or Listed Building consents are needed.

Consequently, the vast majority of boat moorings and the extent of their residential occupation is not subject to planning policy or development control. Some permanent residential moorings, mainly in new marinas, are controlled by planning conditions and these are usually registered for Council Tax purposes. However, there is a national shortage of approved residential moorings (1), and it could be argued that the widespread 'unofficial' use puts a burden on local services without the compensatory Council Tax income and without planning control over any local environmental or social issues. Although the shortage of residential moorings is particularly acute in certain areas such as London, Oxford and Bath, the demand generally exceeds supply across the midlands and this is not helped by unnecessarily restrictive policies in Local Plans (2).

Whilst it is the function of the Local Plan to control and direct residential development to sustainable locations, many of the planning considerations that justify restrictions on built development do not apply in the same way to residential boats. Boats can only be located in the limited areas where the canals exist and the presence of boats is an integral and natural part of the canal system, adding colour and recreational activity to enhance their amenity value, and essential to their economic survival (3). The very restricted height of narrowboats limits their visual impact compared with buildings. They therefore do not compromise the openness of the Green Belt, and individually or in small groups have little effect on the countryside or landscape (3).

It is recognised that large concentrations of boats, such as in new marinas, may have cumulative impacts and IWA therefore supports the principle of these being subject to most of the requirements set out in Policy E7 relating to proximity, countryside, heritage, scale, lighting, landscaping, access, quality, conflict avoidance, traffic, facilities, wildlife, etc.

Whilst IWA generally supports new marinas providing essential moorings and facilities that benefit the waterways, some proposed marina sites raise issues of water supply, congestion, landscape impact or other matters that make them unsuitable. Where new mooring sites are acceptable, both IWA and BW consider that the number of permanent residential moorings appropriate to each location is best decided case by case, without any blanket restrictions (3).

National planning policy requires local plans to take account of the needs of residential communities (5) and residential boaters are a distinctive, if quite varied, community with needs that can only be met in limited locations where their planning impacts differ significantly from residential buildings. The Housing Minister has clearly advised that councils should work to create more residential moorings and made financial incentives available to achieve this (4).

For the reasons given above the blanket prohibition on permanent residential moorings in new marinas is shown to be not justified, cannot be effectively enforced, and is inconsistent with national policy:

- This late addition to the Plan was not part of the public consultation process, and no evidence has been advanced to justify it. By contrast, evidence is given here to support the encouragement of and better provision for residential moorings.
- It is based on the “settlement hierarchy” which relates to residential buildings in villages which is not an appropriate criterion for residential boats. Boats have much less visual impact than buildings and moorings can only be provided where canals exist and not just in favoured built settlements.
- There is no definition of what constitutes permanence, or any mechanism to enforce it. Nearly all boats are used residentially for varying periods of time and most moorings are uncontrolled by any planning consent conditions.
- It fails to make provision for the established, legitimate and largely unmet needs of a distinctive and growing residential community, contrary to national policy and advice.

IWA considers that all the other criteria within Policy E7 that together determine the appropriateness of new marinas and canal facilities give sufficient control over the presence of moored boats at new canal development sites in the Plan area, and that permanent, rather than intermittent, residential occupation of those boats does not introduce any new factors that justify its prohibition.

## 7. Necessary Change

### Summary:

Policy E7 Canal Facilities and New Marinas, condition h, should be amended to:

**h. There are a limited number of permanent moorings for residential purposes, appropriate to the location.**

### Further explanation:

If the representations above are accepted that the present condition ‘h’ is not sound, then the simplest change would be to remove it entirely.

However, the number of permanent residential moorings appropriate to each location may sometimes need to be specified, but this is best decided case by case, and the above amended wording would be acceptable.

## References & Selected Abstracts:

(1) IWA Policy- Mooring on Navigable Waterways. June 2007  
Source: [www.waterways.org.uk/information/policy\\_documents/mooring\\_policy](http://www.waterways.org.uk/information/policy_documents/mooring_policy)

All permanent mooring sites (both on-line and off-line) should include provision for an appropriate number of residential boats. This helps to ensure security at the mooring site and of the boats and other assets

kept there. IWA also recognises that there is a shortage of residential moorings which this would help alleviate. It is important to formalise the number of residential moorings (less than 5% of the total number of moorings is generally accepted as an appropriate figure) and to obtain appropriate planning approval prior to development.

- (2) AINA (Association of Inland Navigation Authorities) Advisory Document: Residential Use of Inland Waterways. September 2010. 42pp.

Source:

[www.aina.org.uk/docs/AINA%20Residential%20Use%20of%20Waterways%20Advisory%20Doc%20Feb%202011.pdf](http://www.aina.org.uk/docs/AINA%20Residential%20Use%20of%20Waterways%20Advisory%20Doc%20Feb%202011.pdf)

Residential use of waterways is a form of housing and residential boaters are recognised by Government as a specific household group. As such, local authorities should consider this household group within their Strategic Housing Market Assessments (SHMAs) and translate their needs and relevant issues into local planning and housing policies where appropriate.

AINA has produced this advisory document as a tool to help inform local authorities, navigation authorities, mooring providers and residential boaters on relevant matters relating to residential use of waterways.

There is currently a strong demand for residential use of waterways and scarce supply of suitable moorings. This presents challenges and has implications for policy and decision-making as well as waterway management.

Some minority household groups are the subject of specific planning guidance such as Circulars, however, there is no such policy guidance for residential boating. In the absence of specific planning guidance, the need for planning permission for residential use of waterways is assessed within the context of the general principles of planning control. As result there is always the of risk inconsistent planning decisions,

- (3) BW (British Waterways): Guidance for Development of New Residential Mooring Sites (England & Wales). May 2011. 13pp.

Source: <http://canalrivertrust.org.uk/media/library/1544.pdf>

There are examples of BW owned and managed residential mooring sites which are located in open countryside or rural settings, and Green Belts. These examples illustrate that residential moorings do not necessarily adversely affect the openness of a Green Belt or the open countryside. BW acknowledges that it is important to assess each potential new residential mooring site on a case by case basis and to apply relevant "sequential" planning policies where appropriate.

Moored boats are an inherent feature of the waterway. Any mooring scheme (residential, leisure or visitor) should bring life and colour to an area and positively contribute to the character and setting of the waterway. The value of residential boaters (with their frequent and regular presence on site) in adding a greater sense of security to the area is generally appreciated by local communities.

- (4) More powers for communities to choose boats on water alongside bricks and mortar. DCLG Press Release. 27 August 2011.

Source: [www.gov.uk/government/news/more-powers-for-communities-to-choose-boats-on-water-alongside-bricks-and-mortar](http://www.gov.uk/government/news/more-powers-for-communities-to-choose-boats-on-water-alongside-bricks-and-mortar)

Housing Minister Grant Shapps today urged local authorities not to become landlocked in their quest to meet local housing needs - but to consider how new powers restoring local control over housing provision and planning can enable people to choose boats on water alongside bricks and mortar.

Mr Shapps said that more people than ever are choosing to make a boat their home and that boats with residential moorings could be an example of how unconventional housing can allow people to live in areas of the country where perhaps they couldn't afford to do so otherwise.

And as new moorings could be eligible for the New Homes Bonus, the Minister said that there was a strong incentive for councils and communities to grant planning permission for more residential moorings. The money that they receive could be invested in new marina facilities or waterside recreational activities that

everyone could benefit from, as well as being used to attract further private investment and drive the regeneration of the often-Brownfield land around parts of the country's waterways.

Mr Shapps said that the Government's commitment to Localism could be an opportunity for living on boats to be given a new lease of life, and allow people to secure a residential mooring that would allow them to live closer to their jobs, family, or children's school.

Citing the inexorable shift in power down to councils and communities, he said that where boaters, councils, navigation authorities and local communities work together, they could create more residential moorings as part of the contribution to increase the housing supply in their area and house more families:

(5) National Planning Policy Framework (DCLG). March 2012.

Core planning principles

17. proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities;

Philip G. Sharpe  
Planning Officer  
Inland Waterways Association, Lichfield Branch

27/2/2013





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

Ref:

**Representations Form**

**(For official  
use only)**

**Please return completed forms to:**

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

**Responses must be received by 12 noon on Thursday 28<sup>th</sup> February 2013**

**This form has two parts:**

**Part A:** Personal Details

**Part B:** Your representations.

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

# Part A

## I. Personal Details\*

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

## 2. Agent's Details (if applicable)

Title	Mr	Mr
First Name	Patrick	Philip
Last Name	Holme	Gratton
Job Title (if applicable)		
Organisation (if applicable)	H&H Holman Properties Ltd	Gratton Planning Services Ltd
Address Line 1		Barn Bank
Address Line 2		Vanity Close
Address Line 3		Oulton
Address Line 4		Stone
Postcode		ST15 8TZ
Telephone Number		07803 252719
E-mail address		grattonplanning@btconnect.com

## Part B – Please use a separate sheet for each representation

Name or Organisation	H&H Holman Properties Ltd
----------------------	---------------------------

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

e.g. Policy Reference, Paragraph, Map title	Policy C3 Paragraph 6.27 Paragraph 6.64 Paragraph 11.14
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*If your comment does not relate to a specific part of the document, or it relates to a different document, for example the Sustainability Appraisal, please make this clear in your response.*

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

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

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

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

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

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

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

**Policy C3** relates to the provision of specialist housing and it is commendable that the Plan contains a specific policy which relates to its provision. However, the policy as worded is not sufficiently positive and will not provide the policy basis for delivering the amount of specialist housing for older people which the Plan identifies at para.11.12.

Specifically, clause b. of Policy C3 is too restrictive in seeking to ensure that new developments for older

people are located **within** settlements within the settlement hierarchy. It is not disputed that settlements in the hierarchy should be the focus for such developments but older persons developments generally require large sites and these are unlikely to be available solely within the settlements. Sites which adjoin the settlements should also be viewed as generally appropriate for the provision of such developments. In the case of Eccleshall, which is identified as a Key Service Village, it is unlikely that a suitably sized site would be available to accommodate a viable scheme which meets the accommodation, care and social elements of an extracare development. A suitable site does exist adjoining the existing settlement boundary, to the east of Castle Street, which is of sufficient size to accommodate an extracare development and do so at a sustainable location adjoining town centre. Similar situations may exist at other settlements in the settlement hierarchy. The wording of clause b. of Policy C3 should be amended to allow for the development of suitable sites which adjoin settlement boundaries.

**Para.6.27** indicates that all Key Service Villages have sufficient land available to accommodate future growth as identified through the SHLAA; it is unclear as to whether this statement includes the requirements for specialist housing for older people. In any event, the claim that there is sufficient land available is unlikely to incorporate any assessment of the space and locational requirements of older persons accommodation. In locations such as Eccleshall, such accommodation is unlikely to be provided on any of the sites within the settlement which have been identified in the SHLAA as being deliverable and developable. Sites adjoining the settlement, notably 96 and 145, which could accommodate development for older persons, have been rejected as being not developable when this is not the case. As such, the SHLAA does not provide a definitive basis for the claim, set out in para. 6.27, that sufficient land is available in Key Service Villages to meet future growth.

**Para. 6.64** This paragraph indicates that the settlement boundaries for Key Service Villages will be established through Neighbourhood Planning or a Site Specific Allocations and Policies documents. This is entirely appropriate but it is important that decisions are based upon up to date information and the spatial needs of the various types of development envisaged. In the case of Eccleshall, older persons accommodation can only be viably provided on land adjoining the settlement. This consideration, coupled with evidence that the site is deliverable and developable, needs to be part of the process of establishing settlement boundaries.

**Para 11.14** This paragraph repeats the content of clause b. of Policy C3 in promoting new extracare schemes **within** settlements. The suggested changes to the wording of clause b. of the Policy need to be reflected in this paragraph so as to confirm that new schemes should be located within **and/or** adjoining settlements within the Sustainable Settlement Hierarchy.

(attach separate sheets as necessary)

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

I. Amend the wording of clause b. of Policy C3 ('Specialist Housing') such that the first line of the Policy will read "**b. Ensuring that any new developments are located in or adjoining a settlement within the settlement hierarchy.....**"

2. Amend para 6.27 to indicate that whilst the SHLAA provides the starting point for confirming whether sufficient land is available to accommodate future growth in Key Service Villages, it does not provide definitive evidence regarding the suitability of potential development sites.

3. Amend para 6.64 to confirm that settlement boundaries will be established through the Neighbouring Planning Process or through Site Specific Allocation and Policies document, but in doing this, proper account will be taken of the needs of particular development types, notably specialist housing for older people, and the suitability of potential sites to meet these needs.

4. Amend para 11.14 by the insertion of the words “**and adjoining**” in the second sentence between the words “**within**” and “**settlements**” .

These changes will improve the positive nature of the Plan and in so doing provide the basis for delivering the development needs of the area at sustainable locations and in sustainable ways. This would reflect a key theme of the National Planning Policy Framework as set out at para 14 of that document.

The changes would also ensure that a wider range of suitable (deliverable and developable) sites will come forward to meet specific development needs, notably specialist housing for older people.

(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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	J Ross Developments (Mr Nick Scott)
Comment ID	PS231
Response Date	27/02/13 12:09
Consultation Point	6.4 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Justified  
. Effective

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

Previous comments regarding the WMRSS apply particularly as 70% of need is from in-migration rather than satisfying locally derived need. In general we support the growth aspirations but have concerns regarding deliverability of 500 dwellings per annum. Past completions are well short of this figure and it is not clear how past and current low completion levels will be made up in the early phases of the Plan. This will require a new and flexible approach to new opportunities in line with SP1.

**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.**

This section needs to be expanded to include more detail as to how these targets are to be met over the Plan period and, in particular, how past underperformance will be made up.

*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





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

Ref:

**Representations Form**

**(For official  
use only)**

**Please return completed forms to:**

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

**Responses must be received by 12 noon on Thursday 28<sup>th</sup> February 2013**

**This form has two parts:**

**Part A:** Personal Details

**Part B:** Your representations.

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

# Part A

## I. Personal Details\*

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

## 2. Agent's Details (if applicable)

Title	MR	
First Name	MICHAEL	
Last Name	JOHNSON	
Job Title (if applicable)	PROJECT MANAGER	
Organisation (if applicable)	SEDDON HOMES LIMITED	
Address Line 1	3 CINNAMON PARK	
Address Line 2	CRAB LANE	
Address Line 3	WARRINGTON	
Address Line 4		
Postcode	WA2 0XP	
Telephone Number	01925 839 500	
E-mail address	MJOHNSON@SEDDONHOMES.CO.UK	

## Part B – Please use a separate sheet for each representation

Name or Organisation	SEDDON HOMES LIMITED
----------------------	----------------------

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

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

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

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

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

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

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

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

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

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

SEE ACCOMPANYING LETTER

(attach separate sheets as necessary)

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

SEE ACCOMPANYING LETTER

(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

N/A

(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**

Our ref: KLW/ab/260213

26<sup>th</sup> February 2013

Stafford Borough Council  
Forward Planning  
Civic Centre  
Riverside  
Stafford  
ST16 3AQ

Dear Sirs

We write further to the recent publication of the Pre Submission Plan for Stafford Borough (January 2013) and principally in respect of the proposed approach to housing development for the town of Stafford.

Seddon Homes Limited (SHL) has an ownership interest in land at Aston Bank Farm, Doxey, to the north of the proposed Strategic Development Location (SDL) situated to the west of Stafford Town. Whilst the SHL site is not currently identified within the proposed western extension area, SHL is keen to ensure that the plan does not prohibit sites outside of the proposed urban extension areas from coming forward for development and helping meet the Borough deliver its housing requirements for the plan period.

It is against this context that the following comments are provided, with reference also made to whether, in our view, the draft plan meets the tests of soundness set out in the National Planning Policy Framework (NPPF) at paragraph 182.

For the avoidance of doubt, these comments should be read alongside those provided previously in response to previous consultation on the draft plan (letter dated 19<sup>th</sup> October 2011 refers, copy attached). We have not sought to repeat our previous comments again.

#### Housing Numbers

Contrary to our previous objections to the emerging plan and in particular, with regard to the proposed housing requirement for the Borough, we note that the Council is still promoting a figure of 10,000 dwellings which sits below that agreed in

the Panel Report pursuant to the West Midlands RSS Phase II Revision Examination (2009), and contrary to the Council's own evidence of housing need (both market and affordable).

We also note that there has been a persistent shortfall in delivery of housing, particularly in the past six years (since 2006) which will have increased pressure on the housing market and need for delivery of new homes.

SHL strongly objects to the Council's proposed housing requirement expressed at draft policy SP2 and on this basis, does not consider the draft plan to be either justified or positively prepared. The housing strategy being pursued by the Council will lead to an under-delivery of new homes, contrary to the evidenced needs of the area. To this end, the plan cannot be considered likely to be effective and is therefore unsound.

### Strategic Sites

In meeting the growth requirements of Stafford Town (present and future), the Council is promoting three urban extensions to the town.

The Council envisages that these will be the focus for development around the town, but part ii) of Policy Stafford 1 does make reference to the potential for other development opportunities to come forward also.

It is important that the draft plan does allow for this, as clearly the strategic sites will take some time to deliver, not least as they are all tied to infrastructure delivery. The plan needs to ensure that there is a constant supply of sites being developed in order to ensure new homes are being brought to the market across the town.

Stafford West (Policy Stafford 3) sits immediately adjacent to the Aston Bank Farm site. It is capable of delivering new development independent of that which is being planned to the south of Doxey Road. It is well located in proximity to local services and infrastructure, in particular, links to the town centre. It is available for development in the short term and there is no reason why development on this site should be held back pending the masterplanning of Stafford West as a more formal urban extension.

As set out in our previous representation, the site has been assessed by the Council as part of the Strategic Housing Land Availability Assessment (SHLAA) and is considered to be a suitable site that can accommodate some new development.

Whilst SHL has no overall objection to the proposed urban extensions, the plan needs to make provision for the allocation of some smaller sites around the town which can deliver new housing in the shorter term. In particular, regard needs to be had to the rates of sales on individual residential developments, which are currently running at much lower levels (in some cases less than half their long term average). This means that market absorption capacity naturally restricts the number of units a single site can deliver in any given year. Only through providing a number of different sites across the town, can a mix of dwellings in terms of size, design, tenure

etc. be created such that a sufficient number of homes are delivered to the market each year.

To this end, the Council needs to put in place sufficient policy provision to allow sites outside of the proposed urban extensions to Stafford Town, to be able to come forward for development, in accordance with the presumption in favour of sustainable development set out in the Framework, in order to address evidenced housing needs in the town.

The current draft plan needs to be made clearer in terms of the ability for landowners/developers to bring forward sustainable sites outside of the proposed strategic growth locations, otherwise we do not believe that the plan in its current form is neither positively prepared or likely to be effective.

### Summary

As currently drafted, the plan does not fully align with the findings of the Council's own evidence base with regards the overall need for new housing across the Borough (both new market and affordable homes). It is not justified.

The strategy for delivering housing around Stafford Town is insufficiently flexible to adapt to the market and will lead to continued under-delivery of homes, to the detriment of the future vitality and viability of the town itself. It is therefore not positively prepared and the housing strategy will be ineffective.

We do not consider that the plan for Stafford is sound, contrary to the requirements of the NPPF. Further work is required to build in the added flexibility the housing strategy needs in order to deliver the identified housing needs and demands of the market.

We trust that these comments will be taken into consideration and request that we are kept informed as to how the Council intends to proceed with the draft plan.

Yours faithfully

**KEN WHITAKER**  
Managing Director  
Seddon Homes Ltd

Our ref: KW/np/191011

19 October 2011

Stafford Borough Council  
Forward Planning  
Civic Centre  
Riverside  
Stafford  
ST16 3AQ

Tel: 01925 839500  
Fax: 01925 839501  
email: sales@seddonhomes.co.uk  
website: www.seddonhomes.co.uk

Dear Sirs,

We write further to the recent publication of The Plan for Stafford Borough and principally in respect of the proposed approach to housing development for the town of Stafford.

Seddon Homes Limited have an ownership interest in land at Aston Bank Farm, Doxley and are keen to see the Draft Plan revised to acknowledge the importance of sustainable sites such as Aston Bank Farm in contributing to the overall housing requirements for the Borough.

The Council's housing requirement for Stafford Borough has been set out in Appendix A of the Draft Plan. This requirement is stated as being 10,000 additional dwellings between 2011 and 2031, i.e. 500 additional dwellings per annum, with approximately 5,500 to be directed to Stafford town (once existing commitments and 'potential developments' have been discounted).

We wish to object to the proposed level of housing development overall, and specifically that directed towards Stafford town.

#### Housing Numbers

The draft RSS for the West Midlands was progressed through to the Panel Report stage in 2009, at which point it was acknowledged that the policy was 'sound' and therefore confirmed the need across the Stafford Borough for an additional 11,000 homes between 2006 and 2026, equating to an annual average of 550 dwellings.

Due to changes in the economic climate and the reduction in housing completions over recent years (as noted below), the need for additional housing will be greater to the Plan date of 2031 as opposed to less than that previously recommended in the RSS.



Since 2006, the Council's housing monitoring report indicates that a total of 2403 dwellings have been built, equating to 400 per annum (HMR 2011). This suggests that not only should the annual target of 550 be adopted in the emerging Plan, but an allowance should be factored in for the shortfall of development already experienced between 2006 and 2011, i.e. 897 dwellings or an additional 45 dwellings per annum for the period 2011 - 2031.

## Strategic Sites

In order to accommodate this additional housing development, and having regard to the commercial issues associated with residential development, it would be prudent of the Council to identify more strategic development sites around the town of Stafford, including the Aston Bank Farm site.

This site is well located in proximity to the local services and existing infrastructure. It lies adjacent to, but can be developed independently of, the proposed western extension area, and is available and achievable for development in the short to medium term.

Representations have been progressed in respect of the site pursuant to the SHLAA and we will pursue these further when the Council progress their site allocations consultation in due course. However, in the meantime, we make this representation in support of the general principle of increasing residential development within Stafford town.

It is not sustainable, nor is it consistent with the provisions of PPS1 or PPS3, for the Council to identify only a handful of strategic sites to accommodate the level of new housing required within Stafford. Although the housing need targets have made an allowance for development being undertaken on those sites identified as 'potential developments' from the SHLAA, this approach is also questionable as the sites should not be taken into account as providing for definitive development unless they benefit from extant planning permission.

The strategic sites identified lie outside the residential development boundary and as such all other sites with potential to provide 10+ residential dwellings (as identified in the SHLAA) should be given equal consideration in meeting the identified need, or as suggested, the increased, new development targets.

As set out in the SHLAA, part of the consideration of sites in terms of whether they will be deliverable or developable is whether they are a suitable location to contribute to the creation of sustainable communities. The identification of additional, potentially smaller, albeit well positioned strategic sites, would help contribute to the creation of a sustainable community. It would be more sustainable to build on the existing communities by providing for the ability to develop and number of smaller, peripheral sites which lie adjacent to, and can therefore be integrated with, existing residential areas and the town centre.

Allocating a small number of large sites for housing growth fails to take account of the constrained housing market that exists currently and can be expected to persist during much of the plan period. Rates of sales on individual residential developments are running at half their long term average and this imposes an upper limit on the number of units that a single site can deliver in one year. Only through providing a number of different sites can the mix of sizes and designs be created such that a sufficient number of new homes can be funded and built within Stafford. A variety of sites offers home buyers choice and enables developments in Stafford to appeal to a wider demographic as well as allowing for preferences in terms of location. The approach currently being suggested within the Draft Plan presents unnecessary risk to housing delivery and is unjustified in the situation that exists where other sites are available and developable.

Paragraph 8.4 of the draft Plan acknowledges that 'due to the scale of new development requirements significant levels of new housing will be required on Greenfield Land on the edge of Stafford Town'. Neither this paragraph, nor the background papers informing the LDF process suggest that the requirement for additional residential development within the town should be restricted to a small number of larger strategic sites around the town. There is no demographic or physical justification for this approach and as such it is flawed and unjustifiable.

We request that the Council revisit their new housing requirements to increase the overall new housing numbers, and in addition that the Council identify additional strategic sites that can accommodate such future development in a sustainable and realistic manner around the towns residential boundary.

Yours faithfully



**Ken Whitaker**  
**Managing Director**

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	J Ross Developments (Mr Nick Scott)
Comment ID	PS233
Response Date	27/02/13 12:16
Consultation Point	6.11 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Justified

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

Nationally the 2011 Census shows that population is significantly greater than 2010 Mid Year estimates. If 2011 figures are not being used, what contingency is there if there proves to be a significant population increase not only in the Stafford Borough area but also in the surrounding areas where 70% of growth is to come from.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	J Ross Developments (Mr Nick Scott)
Comment ID	PS234
Response Date	27/02/13 12:22
Consultation Point	6.12 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Justified

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

Further information as to where to 70% in-migration is coming from. How much is estimated to come from Stoke-on-Trent and how is this consistent with earlier statements of not undermining the 'fragile' housing market in that area. What is the age profile of this in-migration and does this bring disproportionate demands on particular services such as schools. Where is this in-migration employed and what impact does that have on transportation and sustainability issues?

**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.**

Expand this section to explain these issues more fully, or cross reference to other sections in the Plan.

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	Woodland Trust (Mr Justin Milward)
Comment ID	PS235
Response Date	26/02/13 19:05
Consultation Point	9 POLICY STAFFORD 2 ? NORTH OF STAFFORD ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

- . Positively prepared
- . Justified
- . Effective

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

Policy Stafford 2 - North of Stafford, Policy Stafford 3 - West of Stafford, Policy Stafford 4 - East of Stafford, Policy Stone 1 - Stone Town Policy Stafford 1 - Stafford Town (p.37) contains under the 'Environment Heading' the sub-para i - 'Ensuring that development does not damage the integrity of the Cannock Chase Special Area of Conservation (SAC), nature conservation interests and Local Nature Reserves, as detailed in Policies N4 - N6'. There seems no logical reason or justification for omitting this sub-paragraph from any of the Policies listed above. All these policies are concerned with the same issues and it is essential that reference to nature conservation Policies N4 - N6 is incorporated. Omitting this wording renders these Policies neither justified, effective nor positively prepared.

**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.**

Policy Stafford 2 - North of Stafford Policy Stafford 3 - West of Stafford Policy Stafford 4 - East of Stafford Policy Stone 1 - Stone Add to the four Policies above the additional condition - '*Ensuring that development does not damage the integrity of the Cannock Chase Special Area of Conservation (SAC), nature conservation interests and Local Nature Reserves, as detailed in Policies N4 - N6*'.

*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



## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	Moreton Developments Ltd
<b>Comment ID</b>	PS236
<b>Response Date</b>	27/02/13 12:25
<b>Consultation Point</b>	6.25 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

Support use of "third tier" of sustainable villages for provision of future market housing

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.** [Local Plan reps 1\\${4549487368428379582}.docx](#)

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	Woodland Trust (Mr Justin Milward)
Comment ID	PS237
Response Date	26/02/13 19:05
Consultation Point	34 Policy N4 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Consistent with national policy

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

Whilst we are pleased to support this Policy N4 in principle, we consider that sub-paragraph c. is not consistent with national policy as it does not support CREATION of semi-natural habitats like native woodland. As well as the protection and integration of existing trees, hedgerows and woodlands, national policy also calls for the EXPANSION of native woodland. The National Planning Policy Framework (NPPF) supports the need for more habitat creation by stating that: *'Local planning authorities should: set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure'*, (DCLG, March 2012, para 114). Also para 117 states that: *'To minimise impacts on biodiversity and geodiversity, planning policies should:....promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan'*. The new **England Biodiversity Strategy which** makes it clear that expansion of priority habitats like native woodland remains a key aim - *'Priority action: Bring a greater proportion of our existing*

woodlands into sustainable management and expand the area of woodland in England', ( *Biodiversity 2020: A strategy for England's wildlife and ecosystems services* , DEFRA 2011, p.26) . A reading of these new policies in the National Planning Policy Framework together with the England Biodiversity Strategy indicates that habitat expansion, like native woodland creation, should form a high priority for this Local Plan. Woodland creation also forms a significant element in the conclusions of the Government's **Independent Panel on Forestry** , which states: ? *Ensure woodland creation, tree planting and maintenance is part of the green space plan for new commercial and housing development'* (Defra, Final Report, July 2012). This has now been endorsed by the response in the recent **Government Forestry Policy Statement** (Defra Jan 2013): ? *We believe that there is scope for increasing England's woodland cover significantly to deliver economic, social and environmental benefits. We want to see significantly more woodland in England. We believe that in many, although not all, landscapes more trees will deliver increased environmental, social and economic benefits. We particularly want to see more trees and woodlands in and around our towns and cities and wherethey can safeguard clean water, help manage flood risk or improve biodiversity'*. The **South West Forestry Framework Implementation Plan 2009-2012** (Forestry Commission, 2009, Action 2.3) highlights the need to " *Encourage tree planting and woodland establishment*" , and this is repeated in Action 3.6 - " *Develop spatial framework for targeting tree planting and woodland creation*" . There are already good examples emerging of suitable wording on habitat expansion emerging in other Core Strategies - **North Somerset Council Core Strategy Adopted April 2012 CS4: Nature conservation** *The biodiversity of North Somerset will be maintained and enhanced by: 5) promoting native tree planting and well targeted woodland creation, and encouraging retention of trees, with a view to enhancing biodiversity* **Solihull Draft Local Plan - Pre-Submission draft January 2012 Policy P10 Natural Environment** *The Council will seek to protect, enhance and restore the diverse landscape features of the Borough and to create new woodlands and other characteristic habitats, so as to halt and where possible reverse the degrading of the Arden landscape and promote local distinctiveness. The Council will seek to conserve, enhance and restore biodiversity and geodiversity, to create new woodlands and other habitats and to protect and enhance semi-natural ancient woodland and green infrastructure assets across the Borough.* **Draft Core Strategy for Chesterfield Borough Council - Feb 2012 5.25** *Both the Chesterfield and North East Derbyshire Sustainable Community Strategy and the Chesterfield Greenprint aim to increase the tree cover in the borough for the benefit of both people and wildlife as well as improve landscape quality. Tree and woodland planting will help the borough to respond to climate change and flood alleviation, as well as improve biodiversity and levels of amenity.*

**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.**

We would therefore like to see sub-paragraph c. of Policy N4 amended to read (upper case amendments) - ' *Protecting, conserving, enhancing AND EXPANDING the natural and historic environment and irreplaceable semi-natural habitats, such as ancient woodlands, and ancient or veteran trees'*.

*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

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	Woodland Trust (Mr Justin Milward)
Comment ID	PS238
Response Date	26/02/13 19:05
Consultation Point	35 Policy N5 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

- We support Policy N5, especially the final paragraph stating that development will not be permitted that damages ancient woodland or ancient trees as it reflects the latest national policy. The Government's **Independent Panel on Forestry** states: *'Government should reconfirm the policy approach set out in the Open Habitats Policy and Ancient Woodland Policy (Keepers of Time - A statement of policy for England's ancient and native woodland).....Reflect the value of ancient woodlands, trees of special interest, for example veteran trees, and other priority habitats in Local Plans, and refuse planning permission for developments that would have an adverse impact on them.'* (Defra, Final Report, July 2012). This has been endorsed by the response in the recent **Government Forestry Policy Statement** (Defra Jan 2013 ): *'We recognise the value of our native and ancient woodland and the importance of restoring open habitats as well as the need to restore plantations on ancient woodland sites. We, therefore, confirm our commitment to the policies set out in both the Open Habitats Policy and Keepers of Time, our statement of policy for England's ancient and native woodland'*.

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	Woodland Trust (Mr Justin Milward)
Comment ID	PS239
Response Date	26/02/13 19:05
Consultation Point	13.24 Paragraph ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

- . Positively prepared
- . Justified
- . Effective

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

In order to be justified, effective and consistent with national policy, the row entitled 'Green Infrastructure' should include a reference to woodland, in order to be consistent with Policies N4 and N5.

**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 'Notes' for the 'Green Infrastructure' row of the table in paragraph 13.24 to be amended to read (upper case additions) - 'Includes open space; NATIVE WOODLAND; SANGs and Flood alleviation....'

*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

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	Moreton Developments Ltd
Comment ID	PS240
Response Date	27/02/13 12:48
Consultation Point	6.30 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

Hixon has significant levels on employment opportunities. It is unusual in terms of the high level of jobs it provides compared to the level of existing housing provision. At present, the village accommodates an influx of workers from outside the village. New housing will assist the village's sustainability count by increasing the capacity of the village to house local workers and thereby reducing the need to "travel in" to the village. The only deficit that the sustainability survey recognises is local shopping. Traditionally, retail services follow new housing, whereas employment is slow to do so. Because of its unique amount of existing employment, the sustainability level of Hixon will benefit more than any other Key Service Village from new housing.

*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

**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**

To assist the Inspector's understanding of the advantages of Hixon as a key settlement with substantial employment and where new housing would help its sustainability measure

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.** [Local Plan reps 2\\${1435977766371516378}.doc](#)



## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	Moreton Developments Ltd
<b>Comment ID</b>	PS241
<b>Response Date</b>	27/02/13 13:01
<b>Consultation Point</b>	6.40 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

Given the wide range of choices for new housing in the Borough, incursions into the Green Belt are not considered justified. In development control terms, there does not appear to be strong very special circumstances necessary to overcome the strong presumption against inappropriate development.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	J Ross Developments (Mr Nick Scott)
Comment ID	PS242
Response Date	27/02/13 13:28
Consultation Point	6.28 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

We note that Eccleshall has a 'significant level of services for a relatively small population'. However, the implications of this are not stated. It could be argued that the good level of services makes Eccleshall a natural location for new development. Equally, in order to maintain this level of service over the Plan period it will be necessary to bolster the spending capacity of the catchment area.

**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.**

This section should be expanded to explain how the characteristics of these settlements have for growth potential.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Taylor Wimpey UK Ltd - Interests at Stone ( )
Comment ID	PS243
Response Date	27/02/13 12:29
Consultation Point	2 SPATIAL PRINCIPLE 2 (SP2) ? STAFFORD BOROUGH HOUSING & EMPLOYMENT REQUIREMENTS ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.5

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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

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

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

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

The NPPF requires that LPA's ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing (paragraph 47). It requires the preparation of a SHMA to assess the full housing needs working with neighbouring Authorities. The SHMA must meet the household and population projections and address the need for all types of housing including affordable housing (paragraph 159). It requires LPA's to work collaboratively with other bodies to ensure strategic priorities across boundaries are properly co-ordinated and clearly reflected in Local Plans. Joint working is required (paragraph 179). LPA's will be expected to have demonstrated evidence of having effectively coPage 4 of 24 operated to plan for cross boundary issues with a continuous process of engagement

from initial thinking to implementation (paragraph 181). The NPPF is clear in that it requires Local Planning Authorities to ensure their strategies for the provision of housing, employment and other uses are integrated (paragraph 158). It requires LPA's to set out a clear economic vision and strategy which proactively encourages economic growth (paragraph 21) and to significantly boost the supply of housing (paragraph 47). The level of development set out within SP2 and as sought to be justified through the supporting evidence base is unsound and is not consistent with the approach required in the NPPF. It will not meet full objectively assessed needs on the principal basis that;

- . The level of housing provision is significantly less than the most recent, objectively assessed levels of housing growth which were set out within the RSS Phase 2 Revision Panels Report. Neither the Plan, nor the evidence base provides justification for this particularly noting that the Plan for Stafford retains and remains committed to the Growth Point status (paras 3.15 to 3.17).
- . The Policy makes provision for 500 dwellings per annum over the plan period. The Plan period runs for 20 years from 2011 to 2031 and the Housing Trajectories within Appendix F seek to plan for this period. The housing provision fails to address provision since 2006 however and the RSS Phase 2 Revision included clear evidence of housing need since that time. Stafford Borough has seen a consistent under delivery of housing against needs since 2006. The Plan for Stafford should address housing needs from 2006 and address the shortfall in provision which amounts to some 914 dwellings against the RSS Phase 2 Revision (2386 delivery against 3300 requirement) or some 614 dwellings against the Plan for Stafford requirement (2386 delivery against 3000 requirement).
- . The Plan for Stafford approach merely "writes off" past housing requirements and under delivery and starts afresh at 2011. This is not sound. Not only should the Plan for Stafford include consideration of housing requirements from 2006 and address past under delivery, but should do so in a way which is consistent with the approach and provisions of the NPPF and its aims to significantly boost the supply of land for housing. Past under delivery should be addressed sooner rather than later and allowed for in the early years of the Plans housing trajectory.
- . Paragraph 6.10 states that the Council have given planning permission for 2,911 new houses as at March 2012. It further states that this provides for a 6 years supply based on 500 homes per year. This calculation is unsound. The 5 Year Supply Paper within the accompanying Evidence Base is also unsound. The requirement of 500 dwellings per year (even if, without prejudice to objections above, it is assumed to be correct) needs to take on board historic under delivery; the NPPF requires a minimum 5% buffer in any 5 year supply calculation and in the case of Stafford Borough, there is clear evidence of the need to include a 20% buffer given past, persistent under delivery; such under-delivery should be met within the 5 year period; and the supply of 2,911 needs to be test for its deliverability within the 5 year period. The recent Castleworks appeal decision (APP/Y3425/A/12/2172968) confirms this required approach and that the Borough does not have a 5 year supply of land for housing.
- . The Plan's inaccurate recording of its 5 year land supply position results in an unsound housing trajectory and an unsound approach set out at paragraph 13.22 which states, inter alia, that because the Borough has a 5 year supply of land for housing, then the Plan does not require delivery from the Stafford SDL's or from Stone in the first five years of the Plan period. Delivery is needed early in the plan period. Over and above the 5 year land supply position, this approach is also inconsistent with the NPPF which seeks to significantly boost the supply of land for housing.
- . The Plan for Stafford has not been prepared through diligent cross boundary consultation and engagement or demonstrated that the Council has effectively co-operated with other Authorities to plan for cross boundary issues with a continuous process of engagement from initial thinking to implementation. A key legal compliance test and requirement under s33A of the Planning and Compulsory Purchase Act 2004 is that the Plan has been prepared in accordance with the Duty to Co-operate. It is essential that the Council has engaged constructively, actively and on an ongoing basis with neighbouring councils on the strategic matter of the number of houses proposed in the Plan; they must have had regard to the responses of those consulted; and sufficiently considered whether to enter into agreements on joint approaches to plan making and thereby maximising the effectiveness of its plan preparation. These are all requirements of s 33A of the Act. The Plan merely refers to cross border meetings at paragraph 6.12 which does not fully embrace the requirements of statute.

**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 Plan should further justify the level of housing provision.

Requirements from 2006 should be included within the Plan. Historic shortfalls in housing provision should be included and addressed early in the plan period. The Plan should recognise the absence of a 5 year land supply and plan for greater provision of land for housing earlier in the plan. A greater level of growth should be allowed for and additional allocations of land for housing included within the Plan, particularly focused on delivery within the early years of the Plan.

The Council must demonstrate further that they have positively embraced the requirements of statute in respect of the Duty to Cooperate.

*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

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

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	J Ross Developments (Mr Nick Scott)
Comment ID	PS244
Response Date	27/02/13 13:30
Consultation Point	6.37 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

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

We note that there are no major physical constraints on the delivery of new development at Key Service Villages.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Taylor Wimpey UK Ltd - Interests at Stone ( )
Comment ID	PS245
Response Date	27/02/13 12:29
Consultation Point	4 SPATIAL PRINCIPLE 4 (SP4) ? STAFFORD BOROUGH HOUSING GROWTH DISTRIBUTION ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.4

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

**Do you consider that the Plan for Stafford Borough is Sound?** No

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

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

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

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

Policy SP4 sets out a distribution of housing growth between Stafford, Stone, Key Service Villages and the Rest of the Rural area. The proposed distribution of growth suggests some 72% for Stafford, 8% for Stone, 12% for Key Service Villages and 8% in the rural area. This moves away from the distribution within the former Local plan which saw a distribution of 78% for Stafford, 17% for Stone and 5% for Key Service Villages.

Actual distribution and delivery has been more greatly accommodated within the Rural Area providing 35%, Stone at 17% and Stafford at 48%. The role of Stafford as the principal location for growth is supported, however levels of growth need to be sustainable and deliverable over the plan period. Over the preparation of the Plan there have been notable reductions in levels of growth for Stone and it is not clear or transparent as to why this distribution has been adopted over alternatives which could equally be sound and ensure delivery.

The role of Stone is underplayed in the distribution of growth. The plan needs to increase the range and type of housing available and to provide a range of development locations for new homes over



the plan period to 2031, including affordable housing to ensure that there is a realistic prospect of full delivery of open market and affordable housing.

Stone is the second largest settlement in the Borough and should be a location for a significant proportion of the Borough growth behind Stafford itself. It is a sustainable location with services, facilities, employment opportunities as well as transport infrastructure. The plan provides for further employment growth in the town and further housing will support this economic growth.

Growth in housing, employment and retail provision, supported by improvements to local infrastructure including transport linkages, are fundamentally important to the town. Stone has experienced housing growth in recent years and the level of current commitments appears to be in part justification for only a modest level of housing growth directed to the town and it being phased to the later period of the plan post 2021 - the proposed level of 500 dwellings and it being back loaded in the plan are objected to. Such a level of development for Stone fails to reflect its status as the principal market town behind Stafford itself.

The Land for New Homes Monitor 2012 suggests that there are currently 287 commitments in Stone (albeit some of these sites have some issues or deliverability and 33 are for C2 care home use). This combined with the proposed 500 dwellings post 2021 would mean a proposed level of growth for Stone of 787 or merely 7.9% of the total of the remaining years of the plan (2013 to 2031). This is a meagre average build rate of only 80 units a year with the first ten years of the plan, Stone only contributing its existing commitments of around 30 units per year. These are disproportionately low levels for a settlement of the size and sustainability of Stone. By contrast some 72% of the proposed housing growth is being directed to Stafford with the balance in the rural areas including Key Service Villages. Such a balance of provisions is not reasonable and would represent an unrealistic expectation for growth in Stafford, leaving Stone to miss out on the potential benefits of development. It does not provide Stone with its appropriate and balanced share of provision and suggests a significant policy shift from both the previously adopted Local Plan and also evidence of past delivery. Stafford has never been able to sustain such levels of growth and has always been supported in delivery by some growth in Stone and the rural settlements. Both suggest that Stone can support greater levels of growth and a more proportionate share. The level of growth for Stone directly contradicts all that is stated within the Plan about the sustainability of Stone as a settlement and its suitability and ability to accommodate growth, second only to Stafford.

Our representations elsewhere suggest the need for a greater overall level of housing. Even a modest provision of around 15% of the Boroughs total, say 75 dwellings per annum would suggest provision for around 1500 additional dwellings in Stone, taking into account existing commitments, the need to identify around 1200 new dwellings and it is suggested that this is a more appropriate minimum target provision in Stone through the full plan period.

Our objections elsewhere have highlighted a lack of 5 years supply of land for housing and the need for the plan to significantly boost the supply of housing. There are significant challenges to the delivery of the major Strategic Development Locations around Stafford and a more balanced distribution, promoting some early delivery with varied range of more housing allocations in all areas as well as particularly outside of Stafford town would create a plan which is more deliverable.

This section of the Plan also includes a table of Housing Provision at paragraph 6.54. The representations above sit alongside other objections which have also been made about the overall housing provision and the Plan calculation of 5 year supply.

**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 distribution of housing should be amended to reduce an over reliance upon Stafford town and more fairly balance provision elsewhere in order to promote delivery and significantly boost supply, particularly in the early years of the plan.

*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

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

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Taylor Wimpey UK Ltd - Interests at Stone ( )
Comment ID	PS246
Response Date	27/02/13 12:29
Consultation Point	7 SPATIAL PRINCIPLE 7 (SP7) ? SUPPORTING THE LOCATION OF NEW DEVELOPMENT ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.4
Files	<a href="#">Stone plan Taylor Wimpey.pdf</a>

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

**Do you consider that the Plan for Stafford Borough is Sound?** No

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

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

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

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

The move towards the use of Settlement Boundaries is a positive improvement to the Plan compared to earlier draft versions. The approach replaces the former use of Residential Development Boundaries and will logically define a key land use planning distinction between the urban area and Open Countryside. This is important to a sound plan. The Settlement Boundary for Stafford and Stone is being set within this Plan for Stafford. This is supported. However the Settlement Boundary which has been drawn for Stone bears no material differences to the former Residential Development Boundaries. There is no part of the Evidence base supporting the Plan which shows or explains how the Plan has carefully assessed or evaluated which land should be included within or outwith of the Boundary. The accompanying text explains that Settlement Boundaries will be established that provide sufficient scope for the proposed scale of development of housing, employment and other uses within the settlement. Policy SP7 sets out various criteria which will be used to assess development proposals and hence influence the line of the Settlement Boundaries to be defined in the areas other than Stafford and

Stone. It is logical that this full range of criteria have been used to establish the Settlement Boundaries for Stone which are defined in the Plan however there is no Evidence to explain or justify this.

Whilst the principle of Settlement Boundaries is supported;

- . The proposed Boundary for Stone are included in the Plan but have not been fully assessed or supported by any evidence to justify their extent.
- . Moreover, the Boundary within the Plan does little than merely follow the former Residential Development Boundary of the old Local Plan.
- . The Boundary must be established for Stone having regard to the same criteria which are to be used for the wider settlements.
- . The Boundary for Stone must include sufficient scope for the proposed scale of development in the Plan for housing, employment and other uses commensurate with its principal role, noting our objections to the scale of development directed to Stone elsewhere.

An example is set out on the attached Plans TW1. It demonstrates an example of where the Settlement Boundary has not been appropriately assessed and could be extended to logically include land which relates closely to the form of Stone and its landscape setting and would be ideal to provide for the scope to meet future housing needs.

**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 proposed Settlement Boundaries are supported however;

- . The Boundary for Stone should be supported by evidence that they have been appropriately defined, provide sufficient scope for anticipated future growth and have adopted the same criteria as for other settlements set out in the Policy.
- . They should include the land shown in Plan TW1.

*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

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

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	J Ross Developments (Mr Nick Scott)
Comment ID	PS247
Response Date	27/02/13 13:49
Consultation Point	4 SPATIAL PRINCIPLE 4 (SP4) ? STAFFORD BOROUGH HOUSING GROWTH DISTRIBUTION ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Justified  
. Effective

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

In our view it is inconsistent to allocate 8% of growth to the 'Rest of the Rural Area' when at 6.38 it is reasoned that these settlements do not form part of the hierarchy due to the relative lack of services and facilities and the effects of Green Belt policy. We believe that much of this growth should be located in the Key Service Villages where these services are available and which serve their own rural hinterlands. we believe that there is a strong case for restricting development in these lower order villages to essential local need housing including affordable and rural worker housing but excluding general need housing. It is clear from the following paragraphs that Stafford has failed to provide sufficient housing and that much of this growth (35%) has been provided in the rural areas. However, the rural areas also account for 36% of 2001 population so this level of development is not out of proportion. Accepting that a high proportion of in-migration should be directed to Stafford assuming

that the sites can be made available in time to meet demand, we are of the view that 25% of future growth should be in the rural areas and at least 20% should be in the Key Service Villages.

**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.**

As explained above

*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

**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**

We are of the view that the distribution of growth and in particular the role of Key Service Villages should be examined in detail.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Taylor Wimpey UK Ltd - Interests at Stone ( )
Comment ID	PS248
Response Date	27/02/13 12:29
Consultation Point	13 POLICY STONE 2 ? WEST & SOUTH OF STONE ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.5
Files	<a href="#">Stone plan Taylor Wimpey.pdf</a>

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

**Do you consider that the Plan for Stafford Borough is Sound?** No

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

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

- . Positively prepared
- . Justified
- . Effective

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

The identification of land West of Stone for an SDL is objected to in terms of its extent and landscape impact. The site does not minimise impact on the local landscape as suggested. The identification of the site is not the most appropriate against reasonable alternatives. The land south of Eccleshall Road should be included as it less sensitive in landscape terms and relates better to the form of the settlement. The site was suggested by the Council to be too small to be allocated as an SDL and would be more appropriate for consideration at the Allocations DPD stage. Representations have been submitted elsewhere which highlight that the Plan should make greater provision for housing and more provision in Stone.

The land south of Eccleshall Road as shown on Plan TW1 could be combined with the currently allocated SDL and form part of a larger SDL allocation. If it resulted in a reduction in size of the current SDL on its north western limit, it would reduce landscape impact of that development.

The site is deliverable now and will contribute to immediate needs and shortfalls in land for housing supply.

The Plan for Stafford should allocate land south of Eccleshall Road on Plan TW 1 for residential development of around 120 dwellings as phase of the wider SDL. Representations promoting the merits of the site for residential development have been made at a previous stage of the Plan and the site has been included in the SHLAA. The allocation of this site would amount to a viable and deliverable development to assist with early delivery within the plan period. Stone is acknowledged to be a sustainable settlement, second only to Stafford as suitable for growth. It is less sensitive from a landscape perspective than areas of the SDL currently allocated.

There are no impediments to the site's development; the site is not within an area at risk of flooding (moreover the proposals for the site include a site drainage strategy which would reduce surface run off from the site during peak rainfall events which would benefit local flood risk); there are no physical constraints; the site can be accessed safely; there are no ecological constraints; no landscape constraints; the site is not in a Conservation Area, nor are there any adverse impacts on listed buildings; there are no Tree Preservation Orders; and there are a good range of services nearby with, additionally, public transport adjacent to the site. The inclusion of this site as an allocation within the Plan also links to objections submitted by Taylor Wimpey elsewhere and which support the need for further residential development to be allocated.

This includes;

The Plan does not make adequate provision to meet full and objectively assessed needs for open market or affordable housing. This site will contribute to the early delivery of housing and can support the full provision of affordable housing set out in the Plan.

- Stone is sustainable to accommodate a greater level of growth than set out within the Plan. - The allocated SDL at Stone is not the most appropriate against the inclusion of land south of Eccleshall Road as a reasonable alternative

The site's allocation raises no inconsistency with the SEA or would amount to any alternative conclusions to the soundness of the plan if this extended SDL allocation was to be included.

**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 Plan should extend the SDL allocation west of Stone to include the land on Plan TW1 south of Eccleshall 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?** Yes, I wish to participate at the examination in public

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

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



## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Taylor Wimpey UK Ltd - Interests at Stone ( )
Comment ID	PS249
Response Date	27/02/13 12:29
Consultation Point	12 POLICY STONE 1 ? STONE TOWN ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.4

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

**Do you consider that the Plan for Stafford Borough is Sound?** No

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

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

- . Positively prepared
- . Justified
- . Effective

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

Stone 1 seeks to set out policy which aims to enhance Stone's role and increase both its range and quality of services and facilities. For housing it includes providing a range of development locations for new housing and includes a Strategic Development Location to the west of Stone, suggested to minimise the impact on the surrounding landscape. Objection here links to other objections by Taylor Wimpey which seek to both increase the level of housing provision needed in the Borough through the Plan period and also the distribution of growth which seeks a greater level of provision at Stone, commensurate with its role and sustainability. In addition it is also objected that; The identification of the SDL does not minimise the impact on the local landscape as stated in the policy and the incorporation of land south of Eccleshall Road and south to Common Lane is significantly more contained within the local landscape, better related to the settlement form and if linked to a reduction in scale of the SDL north of Eccleshall Road would reduce the impact on the local landscape.

**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 extent of the SDL should be amended to include land south of Eccleshall Road as shown on Plan TW1.

*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

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

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

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Taylor Wimpey UK Ltd - Interests at Stone ( )
Comment ID	PS250
Response Date	27/02/13 12:29
Consultation Point	32 Policy N2 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.4

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

**Do you consider that the Plan for Stafford Borough is Sound?** No

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

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

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

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The Policy sets out a range of sustainable design features which new development is expected to incorporate. Whilst the policy allows for submissions on viability to off set such requirements, there is no part of the Plans evidence base which explains how the level of environmental standards proposed in the policy are viable for most developments.

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

Submissions are made elsewhere about the cumulative impact of Policy requirements within the Plan and evidence of development viability, Plan delivery and therefore SEA robustness.

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Further evidence is required to demonstrate that the environmental building standard proposed are viable.

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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

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

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

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Taylor Wimpey UK Ltd - Interests at Stone ( )
Comment ID	PS251
Response Date	27/02/13 12:29
Consultation Point	40 Policy I1 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3

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

**Do you consider that the Plan for Stafford Borough is Sound?** No

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

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

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

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

This policy relates to Infrastructure Delivery and recognises that such infrastructure as set out in the Infrastructure Delivery Plan is critical to the Plan. A key aspect of soundness is the ability for the Plan to meet its objectively assessed development and infrastructure requirements and that it is deliverable over the plan period. Delivery is challenging in the current economic climate and is likely to be so during a considerable part of the plan period. This will have an impact on development delivery going forward as it has done so over recent years. It is important that the Plan is supported by robust evidence to demonstrate that development and infrastructure is capable of being delivered over the plan period. This is particularly important given that the Plan describes "critical" infrastructure requirements which are set out in Appendix D as part of the Delivery Plan.

The evidence supporting implementation and delivery is not robust and we have significant concerns that the planned development and infrastructure and is not deliverable over the plan period, noting principally;

- . The Viability report within the evidence base focuses on the delivery of affordable housing. The NPPF states at paragraph 173 that "sustainable development requires careful attention to viability

and costs in plan making". The cumulative impact of all policy requirements needs to be fully understood. The potential for non-delivery of all policy aims and aspirations due to viability needs to be considered in the SEA.

- . Without evidence it will not be possible to demonstrate that development would be able to support all policy requirements, cumulatively. Development may also not be able to support Community Infrastructure Levy (CIL). Key infrastructure requirements which are dependent upon CIL are likely to be undeliverable, again contrary to the aims and vision of the plan.
- . If cumulative policy requirements are unlikely to be deliverable, then the Strategic Environmental Assessment is fundamentally flawed. The SEA expects the policy requirements to be met. The SEA also places great reliance in its conclusions on the environmental requirements and mitigations of policy. It also places reliance upon infrastructure improvements in order to conclude the plan is sustainable.
- . The Plan includes Critical Infrastructure within Annex D. Sources of funding are set out within the Annex which includes public sector funding and CIL in many cases. Capital Costs are incomplete however more importantly there is no evidence or certainty of funding streams which are neither explained in the Plan or its evidence base.
- . CIL is explained as being important to the Plan, yet the viability analysis of CIL has not been produced or consulted upon. CIL cannot yet be relied upon as a key component of infrastructure funding.
- . The NPPF suggests that CIL should be worked up and tested alongside the Plan. This is an approach which is important to the Plan for Stafford as it is relying on CIL to deliver required infrastructure. CIL has not advanced to a sufficient stage to demonstrate it can in any way be relied upon to contribute to infrastructure funding. CIL has not been advanced alongside the plan but instead is being added at a late stage. This runs the serious risk of CIL being set at too high a level in order to meet aspirational and unviable infrastructure requirements which have already been set out in the plan.
- . If CIL is not yet set or advanced, it will have the effect of;
- . Not knowing the level of funds which could be sourced/secured.
- . It will not be possible to know how much infrastructure could be funded.
- . The plans infrastructure / development balance cannot be set.
- . The plan does not provide robust evidence to explain how the infrastructure upon which it relies will be deliverable.

Where principal infrastructure improvements are most likely to be delivered by the public sector through central funding and pooled contributions through CIL as well as other central government incentives, their needs to be clear evidence that the Council is making forward plans to deliver the required infrastructure at the required time in order to enable the development in the plan to be delivered. The plan, as drafted, presents significant risks that funding for infrastructure will neither be available or infrastructure delivered by the public sector in order for the development in the plan to be brought forward.

The absence of clear evidence on viability suggests;

- . The amount of development set out in the plan may not be deliverable
- . Only the viable sites will be delivered, leaving more challenging sites
- . The amount of affordable housing delivered will be significantly less than expected.
- . Sustainable policy objectives will not be met
- . The SEA will not be sound in its conclusions as it expects delivery of policy objectives, affordable housing and infrastructure
- . It will fundamentally compromise the plan's Vision and objectives

**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.**

Policy needs to be flexible in order to allow development to proceed where full policy requirements is likely to make development unviable.

CIL must be further advanced in order to ensure it is in place at the adoption of the plan

CIL must be further advanced so that the level of funds which can be viably delivered through CIL can be fully understood and inputted into the Infrastructure Delivery Plan

The infrastructure improvement aims and aspirations of the plan need to be further tested to assess whether they are deliverable, having regard to realistic levels of CIL and public sector funding streams

Viability evidence needs to look more closely at the largest and key development proposals in the plan in order to ensure the plan proposals are deliverable overall and that the scale of infrastructure and policy burdens does not mean that their ability to be developed viably is threatened.

There is no evidence to explain how the Council is preparing for infrastructure delivery.

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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

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

# LES STEPHAN PLANNING LTD

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## REPRESENTATIONS BY LES STEPHAN PLANNING LTD ON BEHALF OF THE MOOR FAMILY TRUST IN RESPONSE TO THE CONSULTATION DOCUMENT - THE PLAN FOR STAFFORD BOROUGH PUBLICATION (PRE-SUBMISSION)

### AREAS OF SUPPORT

1. Our clients welcome the positive response, evident in this document, to the representations previously made in response to the Local Choices consultation document and to the publication of the National Planning Policy Framework (NPPF).
2. We support the spatial vision and key objectives highlighted in Section 5. In particular we fully endorse the direction of future growth in the rural areas through the mechanism of defining a Sustainable Settlement Hierarchy that takes into account the level of infrastructure, services and facilities currently available in those settlements.
3. In addition we also support the particular regard that is given to the need to provide mixed use developments to create more vibrant places and to promote sustainable development in rural areas by locating housing where it will enhance or maintain the vitality of rural communities.
4. We believe that the Spatial Principle SP3 correctly identifies those settlements and our clients are pleased to note that Little Haywood/Colwich is identified as a Key Service Village.
5. Para. 6.26 confirms that Little Haywood/Colwich is located on main transport links running through the Borough and has good accessibility to Stafford. Para. 6.31 confirms that it has a range of community facilities although there is limited employment provision.
6. Para. 6.27 advises that having regard to such factors as levels of services and facilities, environmental designations, transport links and access to employment, it may be appropriate for different Key Service Villages to have different levels of development based on these factors and their individual characteristics. We would support this approach and believe that Little Haywood/Colwich has potential for significant growth having regard to the level of existing services/facilities and the potential for future improvements. As previously identified in our clients various submissions to the LDF process, their land holding can provide a range of new housing, land for employment with a high quality access from the A51 and a range of new and/or upgraded local services/facilities.
7. On our clients' behalf we welcome the opportunity of working with the Council to evaluate this potential for growth as part of the next stage of the LDF process.

Directors:

Les Stephan Dip.T.P, M.R.T.P.I  
Hazel Murphy

Associate:

Stuart Taylor BA (Hons), B.P.L, M.R.T.P.I, D.M.S

Planning & Development  
Finance & Administration  
Planning & Development





## **AREAS OF CONCERN**

1. We remain concerned however as to the suggested distribution of growth as set out in Spatial Principle SP4 and the reasoned justification used for the suggested distribution. The difference between the proposed housing allocations made in the Stafford Borough Local Plan 2001 and the actual delivery and distribution is marked and demonstrates, in our view that actual delivery of housing is more easily achieved throughout the main settlement of the rural areas than in Stafford itself. Whilst the figures may have been distorted by building conversions these are finite resources that cannot be repeated.
2. In order to ensure that deliverability is achieved in our view a greater percentage of housing should be allocated to the rural areas and the Key Settlements identified at point 3 of Policy SP3.
3. In addition, land should be allocated within these settlements to stimulate and promote local sustainable employment thus reducing the need to travel.
4. We have concerns about the continued employment of pre-determined settlement boundaries to achieve the distribution of growth within each settlement. In our view this is an old style regulatory approach that pre-determines design and reduces the scope for spatial vision in creating proposals for each site that are not stifled by fixed boundaries.

## **LAND AT LITTLE HAYWOOD (site 005)**

1. Our clients own the land at Little Haywood identified in the submissions made to the LDF process, which has examined all of the issues that relate to the potential development of this land for a range of mixed uses including provision for a substantial landscaped buffer/country park so as to avoid coalescence with Great Haywood.
2. We wish to emphasise that development of this land is fully deliverable and available. The technical investigations carried out on behalf of our clients (and previously forwarded to the Council) make it clear that there are no major cost impediments to development which would prevent the development from being a viable proposal.
3. Great and Little Haywood are separate villages and their future growth should be considered independently. However, they do share services/facilities and do represent an appropriate location for significant housing growth and for the provision of new employment growth as described above.
4. Our clients land represents an opportunity to help satisfy the aspirations of the Plan for Stafford Borough and its strategic location allows for development to be phased in an ordered manner over the Plan period. Indeed the southern position of the land which lies between Little Haywood and 'The Ring' does represent a natural infill opportunity. We commend it to the council and would welcome the opportunity to further promote the site as a fully sustainable development in accordance with the provisions of the NPPF.

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	Ingestre with Tixall Parish Council (Dr Anne Andrews)
<b>Comment ID</b>	PS253
<b>Response Date</b>	26/02/13 14:32
<b>Consultation Point</b>	The Plan for Stafford Borough - Publication ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	0.4

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

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

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

We note that the land between the Crematorium and Stafford Town, and the Grass Triangle between Tixall Rd, St Thomas Lane and Baswich Lane have been earmarked for housing development, alongwith completion of Phase 1 of the EDR from Beaconside to St Thomas Lane, although there is no indication of the number of dwellings. It is not clear what the parallel lines going through the development from west to east represent (see attached plan). Please can you clarify this. While we welcome the start of the EDR from Beaconside, we are concerned that it's junction with Tixall Road should be via a roundabout, not yet another set of traffic lights; and we are concerned on the effect of the increased traffic, partly generated by the new housing, on the remains of the medieval bridge over Kingston Brook by St Thomas Priory, the Listed Bridge over the River Sow and the narrow bridge over the canal which has a 7 ton limit. The continuation of the EDR is urgently needed, at least to the Cannock Road. It is essential that this highways infrastructure is in place before any further development takes place. We note that no figures are given for the number of houses at Great & Little Haywood, both "Key Service Villages". No doubt there will also be further housing development at Rugeley, outside the Stafford Borough Area. All of this has a significant impact on the amount of traffic using the Tixall Road and Holdiford Road, especially during the morning and evening rush hours. The bends and undulations on the Tixall Road are already accident hot spots, and local residents avoid walking along these roads if at all possible, as it is already too dangerous.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Housing Plus (Ms Ursula Bennion)
Comment ID	PS254
Response Date	27/02/13 15:29
Consultation Point	The Plan for Stafford Borough - Publication ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

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

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

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

I am writing to you in regard of the current Stafford Borough Plan, with particular interest in affordable housing as we are a significant interest in the Borough. We are the preferred development partner for Stafford and Rural Homes and have been actively developing for over 5 years.

Having reviewed the core strategy, I believe it to be sound, and would want to highlight and support the stance the Borough have taken on affordable housing requirements : percentages and thresholds levels.

Our experience to date has shown that the 30% general requirement for affordable housing on qualifying sites is achievable and viable to developers. Only once in the last five years am I aware of a developer

challenging the 30% affordable housing on viability grounds. Even in the current economic climate we are finding that developers are approaching us based on current affordable housing requirements (30%) with no indication that this is not achievable. In addition, our work in South Staffordshire (an area not too dissimilar to SBC - many rural villages and a few urban centres) we have found few developers baulking at the 30% affordable requirement. Indeed in South Staffordshire their current policy indicates that levels between 30% and 40% are viable on different locations. This is not a dissimilar stance to that being taken by Stafford Borough as the council's policy indicates 30% affordable housing across most of the area but up to 40% to the west of Stafford and in Stone.

In terms of thresholds, we commend the approach which the Borough has taken. It is important that lower thresholds are utilised in the rural areas where it is increasingly difficult to deliver quality affordable housing. With the differing thresholds in the various development sizes (above 12 homes in Stafford, Stone and key villages and 3 homes for smaller settlements) there is the ability to deliver much needed affordable homes in the rural areas (even if this is only one or two). Where the thresholds cannot support "on site" affordable housing, we again commend the Borough for taking a pro active approach and looking towards financial contributions to help deliver affordable housing elsewhere. We are very actively working with Stafford and Rural Homes with local Parish Councils to deliver affordable homes for local people via the rural exception site policy, and any financial contributions generated through planning obligations will help us deliver much needed new homes.

We would like to raise one final comment regarding the space standards in respect of any one bedroomed unit. I think it important to ensure that one bedroom units are sustainable in the long term (we are all aware of the difficulty now presented with letting some bedsit accommodation). There has been a recent guidance by Housing our Ageing Population - Panel for Innovation (HAPPI) supported by the Homes and Communities Agency which considered designs of future homes. The report outlines innovative housing examples from across Europe and makes recommendations to central and local government, developers and housing developers about key design features. The All Party Parliamentary Group (APPG) on Housing and Care for Older People, chaired by Lord Best, has highlighted the benefits of improved housing options for older people and one of the main design recommendations for future homes is that there should be a minimum of 3 habitable rooms. We recommend the inclusion of a minimum of 3 habitable rooms within the Stafford plan as a way of ensuring that the smaller homes are fit for the future and will remain attractive to future generations.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Centro (Ms Rachel Bell)
Comment ID	PS257
Response Date	27/02/13 14:16
Consultation Point	The Plan for Stafford Borough - Publication ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.5

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Centro have commented on previous drafts of the Plan for Stafford and welcome that Section 3 Policy Influences (National and Local) - Duty to Co-operate & Cross boarder issues identifies in 3.8 that "a number of cross-boundary key issues where a complimentary approach will be required includes ... provision of infrastructure including transport links, sustainability...". Whilst Stafford Borough Council is not within the West Midlands Metropolitan area (i.e. Centro's principal area of interest), the plan area falls within the West Midlands 'journey to work' area and it is important that sustainable access is provided to regional services and wider employment and education opportunities. Centro supports the principles of The Plan for Stafford Core Strategy and welcomes the many references to public transport contained within it. We are particularly keen to address any cross-boundary issues and wish to ensure that the role of public transport is clearly represented in local planning documents. We will therefore welcome any opportunities to work with Stafford Borough Council in the delivery of any cross boundary schemes. The West Midlands Local Transport Plan also seeks to ensure comprehensive public transport links with key destinations outside the West Midlands Metropolitan area, including those within Stafford Borough. Through working in close partnership with operators and Staffordshire County Council, Centro seek to implement an accessible and modernised network that reflects changing journey patterns both within the Metropolitan area itself and its journey to work area. We would appreciate you keeping Centro informed on the progress of this development plan and therefore Centro wish to be notified:

- . that the Plan for Stafford Borough DPD has been submitted to the Secretary of State for independent Examination;
- . that the Plan for Stafford Borough DPD has been adopted.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Stone Food and Drink Festival CIC (Mr Richard Stevens)
Comment ID	PS258
Response Date	27/02/13 15:55
Consultation Point	12 POLICY STONE 1 ? STONE TOWN ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

We object to the provision of mixed use development at WestbridgePark. The proposal relates to ?WestbridgePark? with no attempt to define or limit the area of ?mixed use? development. If approved, we assume that the entirety of the Park would become available for such development. (This is contrary to statements published by the Borough Council in its public consultation relating to its proposals for the Park.)

We are deeply concerned that a supermarket on WestbridgePark would have a detrimental effect upon shops and businesses in the town centre. We do not accept that shoppers at a supermarket on

Westbridge Park would visit the town after shopping at the supermarket. Pedestrian connectivity to the town is very poor indeed with a couple of very severe 'pinch points' on the pavement. The High Street economy is extremely fragile and would be at risk if this development went ahead. Indeed, we believe that a supermarket would attract existing shoppers out of the High Street.

The Borough Council has issued a leaflet as part of its current Leisure and Recreation Facilities Consultation which contains a sketch plan of 'what the park could look like'. This sketch plan is not to scale and misleading. It does however indicate clearly that the existing access road in the park will be realigned thereby reducing the area of green space. In the absence of any detailed measurements but taking into account the realignment of the road; the proposals for the site i.e. a supermarket; a new leisure centre with a swimming pool; associated car parks; a teenage sports area and an improved children's play area on the park, we believe the Borough Council has failed to demonstrate that there would be sufficient 'event space' remaining for us to continue holding the annual Stone Food and Drink Festival on Westbridge Park.

We do not accept the Borough Council's proposals can be funded by selling a small piece of land to a supermarket developer. We believe that the costs involved in overcoming the constraints upon the site, e.g. contamination from former use as a council tip; repositioning of sewer pipes; highways access and flood alleviation measures can only be met by the sale of a much larger plot of land than currently indicated. This would restrict, even further, the amount of green space available for our Festival.

The maps published with the Plan make no reference to this 'mixed use development' proposal. On the contrary, Westbridge Park is shown as being a significant part of the 'Green Infrastructure' designation for the town. At 'Environment 8.6' on page 65, The Plan acknowledges the importance of Westbridge Park and confirms previous strategy proposals to create a Canal and Riverside Park. Part of the evidence base for the Plan, 'A Green Infrastructure Strategy for Stafford - The Strategic Plan' - published in November 2009, shows Westbridge Park as central to the vision to create a Stone Canal and Riverside Park (see Figure 2.6 on page 24 and related text). That strategy was based upon the Kit Campbell Associates report contained in 'PPG17 Assessment and Open Space and Recreation Facilities Strategy' March 2009 which made numerous references to Westbridge Park and highlighted (in the context of the Green Network) 'the huge significance of Westbridge Park in Stone and the land adjoining it along the river and canal but the relatively fragmented nature and limited quality and value of other spaces in Stone'. Accordingly we contend that the Local Plan proposal is totally inconsistent with other sections of this Plan and with the Council's own previously declared policies for Westbridge Park.

**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 words "including the provision of mixed use development at Westbridge Park" should be deleted from Policy STONE 1. This will make the Plan sound by removing ambiguity and imprecision.

*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

**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**

We wish to participate in the Examination in order to ensure that the impact of this proposal upon the town centre economy and the future of town centre businesses is fully considered and to enable the Food and Drink Festival to be involved in any discussions which will determine the future of Westbridge Park.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Defence Infrastructure Organisation ( Jodie McCabe)
Comment ID	PS259
Response Date	27/02/13 09:02
Consultation Point	2.8 Paragraph ( <a href="#">View</a> )
Status	Processed
Submission Type	Letter
Version	0.5

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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The MOD welcomes the recognition of the presence of Beaconside Barracks at MOD Stafford and the acknowledgement that the number of Service Personnel at the site is due to increase.

However, there is a need for a factual correction to the date within the second sentence, which should read *"By 2015/16 the level of personnel..."*

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Defence Infrastructure Organisation ( Jodie McCabe)
Comment ID	PS260
Response Date	27/02/13 09:02
Consultation Point	5 Spatial Vision and Key Objectives ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.5

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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Key Objective 1 The MOD welcomes this objective which acknowledges a need to provide homes for military personnel.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Defence Infrastructure Organisation ( Jodie McCabe)
Comment ID	PS261
Response Date	27/02/13 09:02
Consultation Point	2 SPATIAL PRINCIPLE 2 (SP2) ? STAFFORD BOROUGH HOUSING & EMPLOYMENT REQUIREMENTS ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The MOD supports the recognition of the need to provide military housing and welcomes the inclusion of military housing as an additional figure to the general requirement for 500 houses per annum.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Defence Infrastructure Organisation ( Jodie McCabe)
Comment ID	PS262
Response Date	27/02/13 09:02
Consultation Point	5 Spatial Vision and Key Objectives ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.5

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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Spatial Vision - The MOD welcomes the fact that the Plan recognises the role the MOD will have in helping to strengthen and diversify the economy and that the MOD forms part of the Council's Vision for the Borough.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Defence Infrastructure Organisation ( Jodie McCabe)
Comment ID	PS263
Response Date	27/02/13 09:02
Consultation Point	5 Spatial Vision and Key Objectives ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Key Objective 10 The MOD welcomes the recognition that public sector organisations such as the MOD will be supported in the Borough.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Defence Infrastructure Organisation ( Jodie McCabe)
Comment ID	PS264
Response Date	27/02/13 09:02
Consultation Point	8 POLICY STAFFORD 1 ? STAFFORD TOWN ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The MOD welcomes the recognition of the MOD within this policy and, in particular, supports the inclusion of the requirement to provide SFA units. Furthermore, the explicit support given in the section on Employment to supporting further development of MOD land at Stafford as a military base is welcomed and supported.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Defence Infrastructure Organisation ( Jodie McCabe)
Comment ID	PS265
Response Date	27/02/13 09:02
Consultation Point	7.6 Paragraph ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The MOD supports this paragraph and welcomes the Council's statement that it will continue to work in close partnership with the MOD.



## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Defence Infrastructure Organisation ( Jodie McCabe)
Comment ID	PS266
Response Date	27/02/13 09:02
Consultation Point	15 Policy E2 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Justified

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

This policy refers to the Settlement Limits which will be defined through Strategic Principle SP7. It is not yet clear where the Settlement Limits for Stafford will be set and whether these will include the entirety of land at MOD Stafford. Whilst the MOD recognises that there is a need to restrict development in the countryside, it is considered that if development on Recognised Industrial Estates is permitted within this policy, then this should be extended to include existing Ministry of Defence sites to enable operational development to take place without the requirement to justify a countryside location.

**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 policy should be extended to include existing MOD sites to ensure that development required for operational purposes is not restricted due to the location of the site.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Defence Infrastructure Organisation ( Jodie McCabe)
Comment ID	PS267
Response Date	27/02/13 09:02
Consultation Point	18 Policy E5 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Paragraph 89 of the National Planning Policy Framework (NPPF) allows limited infilling or redevelopment of previously developed sites providing that the development would not have a greater impact on the openness of the Green Belt and the purposes of including land within it. There is no specific requirement within the NPPF for previously developed sites to be allocated as major developed sites within the development plan to benefit from this provision.

**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.**

It is considered that this policy requires clarification as it appears that the policy is trying to be more restrictive than the NPPF. Whilst it is appreciated that the Council wishes to actively encourage redevelopment of the three sites referred to within Policy E5, it is important that the policy or its supporting text clarifies that these are not the only three sites within the Borough to which this part of the NPPF would apply.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Defence Infrastructure Organisation ( Jodie McCabe)
Comment ID	PS268
Response Date	27/02/13 09:02
Consultation Point	6.13 Paragraph ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The MOD supports the recognition for a separate housing provision for SFA properties

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	raleigh hall estates
<b>Comment ID</b>	PS269
<b>Response Date</b>	26/02/13 16:45
<b>Consultation Point</b>	6.16 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

We firmly support the continuation of the past trends approach to establish a predicted employment land requirement yield of 166 ha. over a 20-year period. The Spatial Vision and Key Objectives of the Borough are growth orientated and suggest much higher employment land requirements and the need to identify new employment land. This will deliver inward investment and sustain the Borough's communities.

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	raleigh hall estates
<b>Comment ID</b>	PS270
<b>Response Date</b>	26/02/13 16:45
<b>Consultation Point</b>	14 Policy E1 ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Providing and safeguarding an adequate employment land supply and variety of land, buildings and utility services, including site expansions, is firmly supported. Employment in the rural areas is also welcomed and consistent with NPPF Policy Guidance for supporting prosperous rural economy by supporting economic growth in rural areas in order to create jobs (para. 28). Promoting development within Recognised Industrial Estates (RIE) is also welcomed and strongly supported, as well as the expansion of business and enterprise in rural areas such as Raleigh Hall Industrial Estate (RIE), again to support sustainable growth in the rural areas.

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	raleigh hall estates
<b>Comment ID</b>	PS271
<b>Response Date</b>	26/02/13 16:45
<b>Consultation Point</b>	15 Policy E2 ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

We support development on Recognised Industrial Estates (RIE) in the rural area to support economic growth and the creation of jobs and prosperity in line with the principles set out in NPPF (para. 28). Raleigh Hall Industrial Estate (RIE) would certainly help to sustain the rural economy with expansion in line with Policy E4.



## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	raleigh hall estates
Comment ID	PS272
Response Date	26/02/13 16:45
Consultation Point	17 Policy E4 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The identification of Raleigh Hall Industrial Estate as a Recognised Industrial Estate (RIE) suitable for expansion to deliver 6 ha. of new employment land is much welcomed and strongly supported. The existing Raleigh Hall Estate is a 12 ha. well established and well maintained employment facility in mid-Staffordshire which is family-owned and operated since 1980. The site includes a 2MW Biomass power plant which has been operational since 2007, providing sustainable power to the estate and environment. The estate is recognised as a principal provider of renewable energy within Stafford Borough and the plant produces heat as well as electricity. It provides significant local employment in the rural area and helps to offset commuting to the larger towns in the area, notably Stafford. As a RIE it has been identified in successive updates of the Borough Council's Employment Land Review, the latest in 2012. In that document, Raleigh Hall had good ratings in market factors, physical factors and sustainability factors. The development of the existing estate has been completed and the construction of the Biomass unit in 2007 was permitted on the land adjacent to the existing estate. Proposals for further expansion onto the adjoining 6 ha. adjacent to the existing estate and the Biomass plant have

been promoted through early versions of the Plan for Stafford Borough and identified as a potential employment area in "The Plan for Stafford Borough" published in September 2011. This will create further employment opportunities, utilise the established renewable energy resources and will encourage inward investment into the rural area, fully in line with national planning policy in the National Planning Policy Framework (NPPF):-

- . Supports the sustainable growth and expansion of all types of business enterprise in rural areas.
- . Supports economic growth in rural areas in order to create jobs and prosperity.
- . Pro-actively meet the development needs of business and support an economy fit for the 21 st century.

The Employment Land Review recognises that a balanced supply of employment land spread across a portfolio of good quality sites will be a key element to the sustainable development of the Borough Council's area for future years and Raleigh Hall is a good quality site forming part of that portfolio. Policy E4 identifies development criteria for both Raleigh Hall and Ladfordfields RIEs. These development criteria can be met, some of them such as design and layout are appropriate to a detailed planning application. However, other criteria have been, and are being, addressed currently. With regard to vehicular access, Transport and Traffic consultants were commissioned by Raleigh Hall to investigate the implications of potential expansion and they concluded in their report, which has been submitted to Stafford Borough Council, that geometry, vehicular visibility, background traffic and general traffic generation have all been considered and that the proposed development of the site for an employment centre can be delivered satisfactorily. Water supply requirements have always been adequate but a further review is currently being undertaken and a meeting has been arranged with the STWA in March 2013. An electricity sub-station already exists and can be extended or a new facility provided on the expansion site. Mains gas is available to the site and can be extended to serve the expansion land. Mains drainage is available to the expansion site. Expansion at Raleigh Hall is considered by the Borough Council in the Consultation Plan for Stafford Borough (para. 91.2) to deliver the employment requirements of Spatial Principle 5 to meet the needs of existing employers, support local economic development and employment in rural areas, whilst not undermining the character of the open countryside. In this way the function and purpose of Raleigh Hall will reflect and help to implement the Plan's overall development growth strategy. We firmly support this view. The boundaries shown on the Proposals Map accompanying the Plan for Stafford Borough for the expansion land are correctly delineated. Within the site there are 4 existing dwellings with shared access via a drive connecting with Sturbridge Lane. These properties are rented by Raleigh Hall. Care will be taken in the design and layout of the expansion site to protect the residential amenity of the properties.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Grainger PLC
Comment ID	PS273
Response Date	27/02/13 16:35
Consultation Point	2 SPATIAL PRINCIPLE 2 (SP2) ? STAFFORD BOROUGH HOUSING & EMPLOYMENT REQUIREMENTS ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

1.1.1 The provision of 500 new homes per year for the plan period, throughout the Borough, is considered to be insufficient. It is proposed that the Plan is unsound for the reasons set out in the following paragraphs.

1.1.2 The provision of 500 new homes per year for the plan period will not be effective or flexible enough to meet the market and affordable housing needs of the area. It is not consistent with national initiatives. The Government's stated intent ? *to boost significantly the supply of housing?* is clearly set out in the NPPF (2012: 47) which builds upon the ?Housing Strategy for England? (2011) where the Government sets out the strategy to increase the supply of housing recognising the role that this

plays in the wider economy and its contribution to social mobility. The level of delivery proposed by the policy will not contribute significantly to meeting these aims.

1.1.3 The Government's intention to revoke Regional Spatial Strategies (RSS) is well known, however at present RSS remains part of the development plan, and as such intentions to move away from the RSS housing requirements should be clearly justified and supported by evidence.

1.1.4 The West Midlands RSS (2008) was subject to a Phase II review which was considered by Examination in Public (2009). Whilst it is acknowledged that this review was not adopted by the Government and as such does not form part of the development plan, it was subject to rigorous assessment and conclusions were formed as part of the panel report submitted to the secretary of state in 2009. The Phase 2 review concluded that the Stafford Borough housing requirement should be 7,000 new homes in Stafford (plus 1,000 Ministry of Defence accommodation) and a further 3,000 across the rest of the Borough, generating an annual average build rate of 550 new homes per year for the period 2006 - 2026 (6.4). The review indicated that the Borough could deliver up to 11,000 new homes.

1.1.5 Since the 2009 RSS review the Government has set out to increase the supply of new homes and this should be addressed by the plan increasing the provision from 500 per year. The possible consequences of this apparent under provision of new homes is not explained or justified or any indication given that provision has been made to meet the additional capacity by neighbouring local planning authorities.

1.1.6 The policy is not effective in that it will not meet the aspirations of the plan which indicates that the Council remains committed to the objectives for growth reflecting that the Borough was previously designated as a Growth Point (2008) (3.17). The housing requirement figures should ensure that they are appropriate and adequately reflect the proposed increase in housing delivery as set out in the 'Growth Point Programme of Development' October 2008.

1.1.7 The policy is not consistent with National Policy in that it will not *respond positively to wider opportunities for growth* (NPPF (2012: 17)). It does not provide opportunities *to meet the full and objectively assessed needs for market and affordable to boost significantly the supply of housing in the housing market area* as set out in the NPPF (2012: 47).

1.1.8 Establishing a housing requirement which reflects only trend-based sources of evidence will not deliver the Council's stated strategy of enabling the Borough to realise its full potential as a key sub-regional centre. Appropriate *policy approaches* must be applied to the objective sources of evidence to ensure that the housing requirement is sufficient to reflect the wider aspirations of the Council.

**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.**

**Change required :** The Plan should increase the provision of new dwellings for the plan period to a minimum target of 550 dwellings per annum met through a variety of sources, not just new build, providing sufficient opportunities to meet the growth aspirations of the strategy, the local needs of the area and giving the Council a flexible approach to respond to changing economic circumstances. The additional new homes requirement should be distributed throughout the rural area met by settlements not currently identified as KSV. This approach would support development in the rural areas as set out in response to (SP4) Housing Growth Distribution and would better reflect current population distribution, a strong market demand and the ability to deliver, in addition to meeting the five year housing land supply.

*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

**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**

To contribute to the discussion on housing requirements for the area, and the location and specific identification of land identified to met these requirements.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Grainger PLC
Comment ID	PS274
Response Date	27/02/13 16:37
Consultation Point	3 SPATIAL PRINCIPLE 3 (SP3) ? STAFFORD BOROUGH SUSTAINABLE SETTLEMENT HIERARCHY ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

1.1.1 The sustainable settlement hierarchy as set out in Policy SP3 indicates that the majority of future development should be directed to the settlements of Stafford and Stone and to 11 named Key Service Villages. It is proposed that the Plan is unsound for the reasons set out in the following paragraphs.

1.1.2 The settlement hierarchy is not effective. The settlement hierarchy by its very nature significantly reduces development opportunities in the other villages not specifically listed within the Policy. This approach will restrict the supply of new homes in the smaller settlements which can lead to stagnation of the population, exacerbating housing price increases and undermining the ability to support existing

services and facilities or indeed create the critical mass to provide new ones. This is noted within the NPPF (2012: 55) which states that, ?

*?To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities, where there are groups of small settlements, development in one village may support services in a village nearby?.*

The only restriction in the NPPFs approach to new homes in the rural areas is to the principle of isolated new homes in the countryside. The proposed rigid approach to the settlement hierarchy disregards the potential opportunities to provide new homes in settlements not listed within the policy. This approach has the potential to cause damage to the provision of rural services and could amplify the issues of access to affordable housing.

1.1.3 By inference settlements not included in the ?Sustainable Settlement Hierarchy? are deemed to be unsustainable. This is at odds with the provisions of the NPPF (2012: 17) in supporting thriving rural communities and meeting the objectively assessed needs of the local population as set out in the ?Core Planning Principles?, which reflect some of the findings of the Matthew Taylor Report: A Living Working Countryside (2008), which set out a series of recommendations to revitalise rural communities.

1.1.4 Paragraph 6.38 of the Plan acknowledges the diverse range of other settlements throughout the Borough but suggests based on ?size, levels of services and facilities, population, accessibility and environmental constraints along with high landscape and nature conservation designations that it is not considered appropriate to include them in the ?Sustainable Settlement Hierarchy?. Whilst it is acknowledged that parts of the rural area does have exceptionally high landscape and nature conservation designations with attractive villages, this does not apply to all the rural areas, nor all of the villages within it for example the settlements of Great Bridgeford and Ranton.

1.1.5 Part of the selection criteria for the Key Service Villages (KSV) places emphasis on the proximity of main transport links through the Borough and to the main settlements of Stafford and Stone. No recognition is given to the opportunities to meet the new homes requirements in the smaller settlements such as Great Bridgeford or Ranton, on or close to these transport routes which could support the services and a facilities of the KSV and main towns. If this approach is to be retained then consideration should be given to including other settlements as KSV specifically Great Bridgeford and Ranton.

1.1.6 Great Bridgeford which has a greater population than both Tittensor and Woodseaves (2001 Census), no particular historic or environmental constraints and is well placed to take further infill. The village is not bounded by Green Belt. Both the Environment Agency and Severn Trent Water have stated that there is spare capacity for foul drainage and mains water within the village. It is only 1.5 miles from a major junction with the M6 and at the edge of the western edge of Stafford Town. It is served by a frequent bus service connecting to Stafford and the wider area beyond. It is a sustainable and sensible location for new market and affordable homes at an appropriate scale, the development of which would be frustrated by the application of this policy.

1.1.7 The Plan should set out the policy approach for Great Bridgeford indicating that this settlement is a suitable location for a new housing growth hub; well connected to the main town of Stafford with the ability to meet demand for new homes which would help to support local services and meet the objectives of the plan - to provide for high quality housing development. The principle of considering settlements which are well related to Stafford and other KSV has been established in the plan through the identification of the settlement of Woodseaves (6.26) as a KSV.

1.1.8 Similarly, other villages such as Ranton do have existing facilities and would benefit from further housing development within them, to help to sustain these facilities and support those in adjoining villages, specifically local schools. Ranton has no particular environmental constraints and opportunities for small scale infill have been identified. In a predominately rural Borough such as Stafford such an approach needs to be taken in order to balance the urban and rural elements, otherwise existing affordability and rural service provision issues become amplified.

1.1.9 The Policy is not consistent with national guidance. All settlements must be allowed to meet their full and objectively assessed needs. The NPPF (50) identifies that : ? *to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities* Local Planning Authorities should :

*?identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand ??*

1.1.10 The approach of the sustainable settlement hierarchy does not achieve this. The policy should either extend the list of KSV to include more settlements specifically those of Great Bridgeford and Ranton, or recognise the roles of these and other settlements in meeting the Borough's development needs and ensure that no settlements are overlooked in terms of contributing to the delivery of new homes.

**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.**

Change Required:

The policy should either extend the list of KSV to include more settlements specifically those of Great Bridgeford and Ranton, or recognise the roles of these and other settlements in meeting the Borough's development needs and ensure that no settlements are overlooked in terms of contributing to the delivery of new homes.

*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

**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**

To contribute to the discussion regarding the settlement hierarchy with specific regard to rural areas and the settlements of Great Bridgeford and Ranton.



## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Grainger PLC
Comment ID	PS275
Response Date	27/02/13 16:38
Consultation Point	4 SPATIAL PRINCIPLE 4 (SP4) ? STAFFORD BOROUGH HOUSING GROWTH DISTRIBUTION ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

1.1.1 The Policy is unsound in that it will be ineffective in providing for all development needs in all locations throughout the Borough. The distribution of the housing provision does not provide for a sufficient scale and type/tenure of new homes development in the rural areas, specifically outside of the named main towns and Key Service Villages (KSV). Provision of 12% and 8% of the total housing requirement to the KSV and the rural area respectively, is considered to be a significant under provision.

1.1.2 Stafford Borough is predominantly rural in nature comprising two main towns and a number of villages ranging in size. The proposed distribution of housing growth places too much emphasis on

the County town of Stafford and not enough on the rural areas which has a significant proportion of the Borough's total population. The rural area is home to 20% of the Boroughs population (6.41) yet the plan only allocates 8% of the housing requirement; in comparison the town of Stafford is home to 52% of the Borough's population yet the plan identifies 72% of the housing requirements. Even allowing for the accepted strategy of focusing the delivery of the majority of new homes in the main urban areas this proportion (72%) is considered to be an over provision at the expense of delivering housing in the rural area.

1.1.3 The Stafford SHLAA (2012) identifies 425 completions of new homes during 2011/12, of these 143 were in the rural area compared with 119 in Stafford town, 99 in the KSV and 64 in Stone. Clearly the rural areas have the ability to deliver new homes, and there is a strong demand and a strong market for new homes as corroborated by the SHMA (2012: 4.18) which indicates a strong demand for executive housing on the periphery of Stafford, within the Borough's villages and rural areas. The delivery of new homes in the rural areas should not be fettered by the Plan. Regard should be had to the ability of the rural areas to help meet the Borough's housing ambitions and to delivering a wide choice of high quality homes, widen opportunities for new home ownership and create sustainable, inclusive and mixed communities NPPF(2012: 50).

1.1.4 It is questioned whether this strategy is attainable. There is no indicative phasing of development which demonstrates regard has been had to the impact of the current recession on the housing market and the necessary and significant amount of new infrastructure which is required to support the significant number of new homes proposed in strategic development locations, particularly in Stafford.

1.1.5 The plan indicates that delivery of new homes in Stafford town amounted to 119 between 2011/12, however the commitments and new provision will collectively require 7081 new homes over a 19 year period, amounting to an average delivery rate of 373 new homes per annum. There will be a time delay in bringing these strategic development sites on line to contribute to the 373 annual target. The strategic development locations identified to meet the majority of Stafford towns housing provision all require master planning work and significant infrastructure development, the progress of these will be well into the plan period and as such the average delivery rate will need to increase in the second and third periods of the plan to account for an element of catch-up. The ability to deliver the stated housing figures to Stafford Town as apportioned in the plan is thus questioned.

1.1.6 The plan indicates that the SHLAA identifies sufficient land to meet the housing requirements and that the recently published '5 year land supply statement' demonstrates more than six years of housing land supply. The principles used in this assessment are questioned and as such it is contended that there is not a five year housing land supply.

1.1.7 A blanket discount of 10% is applied to the commitments in Table 6.54, this is not justified and no indication is provided as to whether there are variations to this based on the scale of a site or its geographical location. The commitments also include 637 in-principle approvals (ie subject to Section 106 agreements). There is no guarantee that these will come to fruition and technically these new homes do not yet have planning consent. Table 6.54 includes provision for 2620 new homes as commitments including a 10% discount, however the '5 year housing land supply statement' includes this figure as 2074, paragraph 2.16 *'Accordingly the committed figure of 2274 units is consequently reduced by 227 units to give a revised total of 2074 units'*. There is a discrepancy between the evidence base and the core strategy approach.

1.1.8 The discounted commitments are then subtracted from the total requirement, in the rural areas this results in the housing requirement at 8% of 10,000, 800 new dwellings being reduced by: 143 to account for completions in 2011/12, and then by a further 360 to account for existing discounted commitments. This leaves the LPA with the flexibility to permit only 297 new homes throughout the rural area for the remainder of the plan period amounting to 19 years. This allows on average, only 15 new homes per annum,  $[297/19 = 15]$ . Further assessment of the approach used is required to establish the actual housing requirement for the Borough and sub areas and settlements within it.

1.1.9 Paragraph 6.60 of the plan indicates that a key objective of the plan is to enable an appropriate proportion of new development across the rural areas of the Borough. It is contested that this objective has not been met. The housing requirement as set out in table 6.54 and the distribution in Policy SP4 is not appropriate and as such will not meet this objective.

1.1.10 The '5 year land supply statement' (2012) indicates at 2.13 *'Given that all the 2,911 units referred to above have the benefit of an extant residential consent all were considered to be such potential sites and, consequently, none of them have been assessed on an individual basis in terms*

of their deliverability?. The 2911 units include the 637 in-principle approvals. The NPPF makes it clear at footnote 11 to paragraph 47 that:

*?To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans?.*

1.1.11 The Council have not provided any evidence to demonstrate that they have assessed the viability of sites with planning consent for their realistic prospect of delivery. In the current economic climate and the corresponding impact on the delivery of new homes a realistic assessment of site viability should be undertaken. This could potentially result in a decrease of the number of new homes delivered via sites with extant consents or could lengthen the period for anticipated delivery dates pushing the delivery of new homes further into the plan period and thus affecting the current five year housing land supply.

1.1.12 The robustness of the Council's 5 year housing land supply is questioned. Completions against the RSS Phase II allocation of 550 dwellings would indicate that since 2006 there has been a shortfall in provision, amounting to an under provision. In only one of the last six years has this level of provision been met, this indicates a persistent under provision and would require a 20% buffer in accordance with paragraph 47 of the NPPF. Taking the buffer and under provision into account it is clear that the Council does not have a 5 year housing land supply and it is questionable whether this requirement could be met.

1.1.13 Paragraph 6.49 makes reference to the Councils intent to apply a moratorium period on new development where the delivery of development exceeds 25% over a four year period when considered against the percentages set out in SP4. This approach is unjustified and inadequately explained. Increased delivery in one settlement is not guaranteed to meet the housing needs of another entirely separate settlement. This approach is likely to unduly restrict the ability of specific settlements to meet their respective housing needs, potentially resulting in their conflict with the NPPF. The Core Strategy needs to be flexible, to provide the ability for each individual settlement to meet its housing needs.

**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 proposed apportionment of the housing requirements should be amended by reducing the percentage for Stafford Town and correspondingly increasing the percentage allocated to the rural area or Key Service Villages if the number and range of KSV identified is to be increased. The robustness of the 5 year housing land supply should be addressed. Delete paragraph 6.49 referring to a moratorium on planning consents.

*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

**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**

To contribute to the discussion on the distribution of new residential development

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Grainger PLC
Comment ID	PS276
Response Date	27/02/13 16:39
Consultation Point	6 SPATIAL PRINCIPLE 6 (SP6) ? ACHIEVING RURAL SUSTAINABILITY ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

1.1.1 Paragraph 6.60 states that ? a key objective of the plan is to enable an appropriate proportion of new development across the rural areas of the Borough ?. This objective and the criterion (iii) which promotes ? appropriate rural housing schemes to achieve sustainable communities? is strongly supported as a reflection of NPPF guidance.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Grainger PLC
Comment ID	PS277
Response Date	27/02/13 16:40
Consultation Point	7 SPATIAL PRINCIPLE 7 (SP7) ? SUPPORTING THE LOCATION OF NEW DEVELOPMENT ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Effective

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

1.1.1 The principle of the policy is generally supported; however it should include provisions for considering new development in settlements not included in the settlement hierarchy. The criteria (a) to (l) are equally applicable to the consideration of all sites for new development within settlements.

1.1.2 The final paragraph of Policy SP7 is poorly worded. It is accepted that plans should encourage the provision of development on 'brownfield land' as set out in the NPPF (2012: 17) 'encourage the effective use of land by reusing land that has been previously developed (brownfield) land, provided that it is not of high environmental value'. However the wording of this policy relies on sites being 'available' there is no recognition of whether the sites are, 'deliverable' or 'developable'. The policy wording should be revised accordingly.

**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.**

Change Required: The final paragraph of this policy should be reworded to recognise that sites greenfield sites may need to be released to meet the housing requirements within the plan period. Where the reusing of previously developed land is to be encouraged ( *provided it is not of high environmental value* ) regard should be had to whether sites are 'deliverable' and 'developable'.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Grainger PLC
Comment ID	PS278
Response Date	27/02/13 16:41
Consultation Point	8 POLICY STAFFORD 1 ? STAFFORD TOWN ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Effective

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

1.1.1 The policy as currently drafted is unclear and in conflict with the Housing Provision table at 6.54 of the plan. Table 6.54 provides for 5560 new homes to Stafford Town, where as Policy Stafford 1 seeks to provide 5500 new homes. The difference between these figures should be clarified.

1.1.2 At Policy SP2 it indicates that;

*? provision will be made for 500 new dwellings per year over the plan period, not including additional requirements for military housing??.*

However, Policy Stafford 1 indicates that Stafford town will provide 5,500 new homes, including additional provision for MOD Personal, the policy later indicates in criterion (v) that up to 400 new

Service Family Accommodation units will be provided. Clarification is sought on whether the provision for Service Family Accommodation is included or is not included in the figures. If the housing provision set out within the Policies for Stafford 2, 3, and 4 are collated this provides for a total of 5,900 new homes. It is assumed that the provision for 400 new homes set out in criterion (v) is excluded from the figures stated in Stafford 1, but further clarification is sought.

1.1.3 It is questioned whether this strategy is attainable. There is no indicative phasing of development which demonstrates regard has been had to the impact of the current recession on the housing market and the necessary and significant amount of new infrastructure which is required to support the significant number of new homes proposed in the strategic development locations, particularly in Stafford.

1.1.4 The plan indicates that delivery of new homes in Stafford town amounted to 119 between 2011/12, however the commitments and new provision will collectively require 7081 new homes over a 19 year period, amounting to an average delivery rate of 373 new homes per annum. There will be a time delay in bringing these strategic development sites on line to contribute to the 373 annual target. The strategic development locations identified to meet the majority of Stafford towns housing provision all require master planning work and significant infrastructure development, the progress of these will be well into the plan period and as such the average delivery rate will need to increase in the second and third periods of the plan to account for an element of catch-up. The ability to deliver the stated housing figures to Stafford Town as apportioned in the plan is thus questioned. Over all this will place the achievements of the Borough's housing requirements at risk, with a heavy reliance on three strategic locations. A more dispersed strategy to meet the housing requirements is required which has regard to genuinely deliverable and developable sites to meet the full and objectively assessed needs within the plan period.

**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.**

A more dispersed strategy to meet the housing requirements of the Borough is required. This should be achieved by reducing the reliance on three strategic sites at Stafford to meet the delivery of 3,100 dwellings, during the plan period. The strategy should have regard to genuinely deliverable and developable sites to meet the full and objectively assessed needs within the plan period. If suitable deliverable and developable sites can't be identified in Stafford town then the housing requirement should be reapportioned to the rural areas where it can be demonstrated that sites can accommodate the housing requirements within the plan period.

*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

**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**

To contribute to the discussion on where the Borough's housing requirements can best be met.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Grainger PLC
Comment ID	PS279
Response Date	27/02/13 16:42
Consultation Point	9 POLICY STAFFORD 2 ? NORTH OF STAFFORD ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Justified

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

1.1.1 Questions have been raised through responses to policies (SP2) (SP3) and (SP4) regarding the housing requirements, the distribution of new housing, the settlement hierarchy, the five year housing land supply and the ability to deliver on this supply. All of these issues should be considered in more detail regarding the specific land identified to meet the development needs in North Stafford.

1.1.2 There is no indicative phasing of development which demonstrates regard has been had to the impact of the current recession on the housing market and the necessary and significant amount of new infrastructure which is required to support the significant number of new homes proposed in the strategic development locations.

1.1.3 The plan indicates that delivery of new homes in Stafford town amounted to 119 between 2011/12, however the commitments and new provision will collectively require 7081 new homes over a 19 year period, amounting to an average delivery rate of 373 new homes per annum. There will be a time delay in bringing these strategic development sites on line to contribute to the 373 annual target. The strategic development locations identified to meet the majority of Stafford towns housing provision require master planning work and significant infrastructure development, the progress of these will be well into the plan period and as such the average delivery rate will need to increase in the second and third periods of the plan to account for an element of catch-up. The ability to deliver the stated housing figures to Stafford Town as apportioned in the plan is thus questioned.

**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.**

A more dispersed strategy to meet the housing requirements of the Borough is required. This should be achieved by reducing the reliance on strategic sites at North Stafford to meet the stated delivery of 3,100 dwellings, during the plan period. The strategy should have regard to genuinely deliverable and developable sites to meet the full and objectively assessed needs within the plan period. If suitable deliverable and developable sites can't be identified in Stafford town then the housing requirement should be reapportioned to the rural areas where it can be demonstrated that sites can accommodate the housing requirements within the plan period.

*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

**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**

To contribute to the discussion on meeting the Borough's housing requirements and how/where this can be achieved.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Grainger PLC
Comment ID	PS280
Response Date	27/02/13 16:44
Consultation Point	10 POLICY STAFFORD 3 ? WEST OF STAFFORD ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Justified

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

1.1.1 Questions have been raised through responses to policies (SP2) (SP3) and (SP4) regarding the housing requirements, the distribution of new housing, the settlement hierarchy, the five year housing land supply and the ability to deliver on this supply. All of these issues should be considered in more detail regarding the specific land identified to meet the development needs in West Stafford.

1.1.2 There is no indicative phasing of development which demonstrates regard has been had to the impact of the current recession on the housing market and the necessary and significant amount of new infrastructure which is required to support the significant number of new homes proposed in the strategic development locations.

1.1.3 The plan indicates that delivery of new homes in Stafford town amounted to 119 between 2011/12, however the commitments and new provision will collectively require 7081 new homes over a 19 year period, amounting to an average delivery rate of 373 new homes per annum. There will be a time delay in bringing these strategic development sites on line to contribute to the 373 annual target. The strategic development locations identified to meet the majority of Stafford towns housing provision require master planning work and significant infrastructure development, the progress of these will be well into the plan period and as such the average delivery rate will need to increase in the second and third periods of the plan to account for an element of catch-up. The ability to deliver the stated housing figures to Stafford Town as apportioned in the plan is thus questioned.

**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.**

A more dispersed strategy to meet the housing requirements of the Borough is required. This should be achieved by reducing the reliance on the strategic sites at West Stafford to meet the stated delivery of 2,200 dwellings, during the plan period. The strategy should have regard to genuinely deliverable and developable sites to meet the full and objectively assessed needs within the plan period. If suitable deliverable and developable sites can't be identified in Stafford town then the housing requirement should be reapportioned to the rural areas specifically the nearby settlement of Great Bridgeford, where it can be demonstrated that housing can be delivered within the plan period.

*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

**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**

To contribute to the discussion on meeting the Borough's housing requirements and how/where this can be achieved.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Grainger PLC
Comment ID	PS281
Response Date	27/02/13 16:45
Consultation Point	11 POLICY STAFFORD 4 ? EAST OF STAFFORD ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Justified

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

1.1.1 Questions have been raised through responses to policies (SP2) (SP3) and (SP4) regarding the housing requirements, the distribution of new housing, the settlement hierarchy, the five year housing land supply and the ability to deliver on this supply. All of these issues should be considered in more detail regarding the specific land identified to meet the development needs in East Stafford.

1.1.2 There is no indicative phasing of development which demonstrates regard has been had to the impact of the current recession on the housing market and the necessary and significant amount of new infrastructure which is required to support the significant number of new homes proposed in the strategic development locations.

1.1.3 The plan indicates that delivery of new homes in Stafford town amounted to 119 between 2011/12, however the commitments and new provision will collectively require 7081 new homes over a 19 year period, amounting to an average delivery rate of 373 new homes per annum. There will be a time delay in bringing these strategic development sites on line to contribute to the 373 annual target. The strategic development locations identified to meet the majority of Stafford towns housing provision require master planning work and significant infrastructure development, the progress of these will be well into the plan period and as such the average delivery rate will need to increase in the second and third periods of the plan to account for an element of catch-up. The ability to deliver the stated housing figures to Stafford Town as apportioned in the plan is thus questioned.

**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.**

A more dispersed strategy to meet the housing requirements of the Borough is required. This should be achieved by reducing the reliance on the strategic sites at East Stafford to meet the stated delivery of 600 dwellings, during the plan period. The strategy should have regard to genuinely deliverable and developable sites to meet the full and objectively assessed needs within the plan period. If suitable deliverable and developable sites can't be identified in Stafford town then the housing requirement should be reapportioned to the rural areas where it can be demonstrated that sites can accommodate the housing requirements within the plan period.

*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

**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**

To contribute to the discussion on meeting the Borough's housing requirements and how/where this can be achieved.



## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Grainger PLC
Comment ID	PS282
Response Date	27/02/13 16:46
Consultation Point	15 Policy E2 ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

1.1.1 The Policy is unsound, it seeks to '*meet the essential local development needs of a community*' (criterion iv), but then applies a sequential approach. This sequential approach requires developers to demonstrate that the *development need* cannot be met in one of the settlements identified in the Sustainable Settlement Hierarchy as set out in Policy SP3. Without a specific definition of 'development needs' this has been taken to include '*housing needs*'. The approach set out in this criterion, by its very nature, is against the principles of meeting the objectively assessed and identified housing needs. By providing new homes in one of the settlements identified in the KSV, the plan will not necessary meet the needs of the Borough?s other settlements, which should properly be met in full within the settlement where the needs arise.

1.1.2 The Policy is not consistent with national guidance. All settlements must be allowed to meet their full and objectively assessed needs. The NPPF (50) identifies that : ? *to deliver a wide choice of high quality homes , widen opportunities for home ownership and create sustainable, inclusive and mixed communities* Local Planning Authorities should :

*?identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand ??*

1.1.3 The approach of this Policy does not achieve this. The NPPF (70) requires planning policies to: *'ensure an integrated approach to considering the location of housing, economic uses and community facilities and services'*

The policy should recognise the roles of other settlements in meeting the Borough?s development needs and ensure that no settlements are overlooked in terms of providing opportunities for the delivery of new homes to meet this integrated approach, recognising that new housing development may help to support the retention or indeed the development of local services and facilities in the settlement.

1.1.4 The only restriction in the NPPFs approach to new homes in the rural areas is to the principle of isolated new homes in the countryside. This policy approach set out in Policy E2 has the potential to cause damage to the provision of rural services and could amplify the issues of access to affordable housing.

1.1.5 The delivery of new homes in the rural areas should not be fettered by the Plan.

**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.**

Criterion (iv) should be deleted.

*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

**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**

To contribute to the discussion on sustainable rural development, specifically housing development.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Grainger PLC
Comment ID	PS283
Response Date	27/02/13 16:46
Consultation Point	25 ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Justified

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

1.1.1 The SHMA identifies a need for 210 affordable units per year over the plan period, equating to 42% of the Borough's total new homes requirement. The plan seeks to meet the Borough's affordable housing needs by requiring between 30-40% affordable housing provisions on all sites above specific site thresholds as set out in Policy C2.

1.1.2 It is recognised that the provision of affordable housing through exceptions site is very difficult to achieve, and as such heavy reliance will need to be on the provision of affordable housing through market schemes to meet the targets. The NPPF(2012: 54) recognises that *in rural areas local planning authorities should consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs?* . The current distribution of new housing

proposed in SP4 will not facilitate the provision of rural housing and will consequently not support the provision of affordable housing in the rural communities.

1.1.3 The distribution of the housing provision does not provide for a sufficient scale and type/tenure of new homes development in the rural areas, specifically outside of the named main towns and Key Service Villages (KSV). Provision of 12% and 8% of the total housing requirement to the KSV and the rural area respectively, is considered to be a significant under provision and would not adequately support the provision of the identified affordable housing needs.

1.1.4 Stafford Borough is predominantly rural in nature comprising two main towns and a number of villages ranging in size. The proposed distribution of housing growth places too much emphasis on the county town of Stafford and not enough on the rural areas which has a significant proportion (20%) of the Borough's total population and consequently affordable housing need which should be met where the need arise.

1.1.5 The only restriction in the NPPFs approach to new homes in the rural areas is to the principle of isolated new homes in the countryside. The proposed rigid approach to the settlement hierarchy disregards the potential opportunities to provide new homes in settlements not listed within the policy. This approach has the potential to cause damage to the provision of rural services and could amplify the issues of access to affordable housing.

1.1.6 The delivery of new homes in the rural areas should not be fettered by the Plan. Regard should be had to the ability of the rural areas to help meet the Borough's housing ambition and to delivering a wide choice of high quality homes, widen opportunities for new home ownership and create sustainable, inclusive and mixed communities NPPF(2012: 50).

**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 policy should be amended to indicate that: consideration will be given to allowing market housing in the rural areas, outside of the settlements identified by (SP3), which would facilitate the provision if significant additional affordable housing to meet local needs.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Grainger PLC
Comment ID	PS284
Response Date	27/02/13 16:47
Consultation Point	28 Policy C5 ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

1.1.1 This policy applies a sequential approach requiring developers to demonstrate that the provision of new residential development cannot be met in one of the settlements identified in the Sustainable Settlement Hierarchy as set out in (SP3). This approach is not consistent with national guidance. All settlements must be allowed to meet their full and objectively assessed needs. The NPPF (50) identifies that : ? *to deliver a wide choice of high quality homes , widen opportunities for home ownership and create sustainable, inclusive and mixed communities* Local Planning Authorities should :

?identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand ??

1.1.2 This policy approach and specifically Criterion (1) does not achieve this. The policy should recognise the roles of settlements not listed in Policy SP3 ?Sustainable Settlement Hierarchy? in

meeting the Borough's market and affordable housing and ensure that no settlements are overlooked in terms of new housing delivery. The provision of new homes in one settlement will not necessarily meet the needs of the population of the Borough's other settlements.

1.1.3 Policy criterion (2) effectively restricts all new residential development in settlements not listed in Policy SP3 'Sustainable Settlement Hierarchy' to affordable housing only. Under this policy no new market housing will be delivered in the rural areas outside of the eleven KSV. The NPPF (2012: 54) indicates;

*'in rural areas local planning authorities should consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs?'*

There is no evidence that this approach has been considered by the Council.

1.1.4 This approach will restrict the supply of new homes in the smaller settlements which can lead to stagnation of the population, exacerbating housing price increases and undermining the ability to support existing services and facilities or indeed create the critical mass to provide new ones. This is noted within the NPPF (2012: 55) which states that,

*'To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities, where there are groups of small settlements, development in one village may support services in a village nearby?'* 1.1.5 The only restriction in the NPPF's approach to new homes in the rural areas is to the principle of isolated new homes in the countryside. The proposed rigid approach to the settlement hierarchy disregards the potential opportunities to provide new homes in settlements not listed within the policy. This approach has the potential to cause damage to the provision of rural services and could amplify the issues of access to affordable housing.

1.1.6 Paragraph 6.38 of the Plan acknowledges the diverse range of other settlements throughout the Borough but suggests based on 'size, levels of services and facilities, population, accessibility and environmental constraints along with high landscape and nature conservation designations that it is not considered appropriate to include them in the 'Sustainable Settlement Hierarchy'. Whilst it is acknowledged that parts of the rural area does have exceptionally high landscape and nature conservation designations with attractive villages, this does not apply to all the rural areas, nor all of the villages within it for example the settlements of Great Bridgeford and Ranton.

1.1.7 Part of the selection criteria for the Key Service Villages (KSV) places emphasis on the proximity of main transport links through the Borough and to the main settlements of Stafford and Stone. No recognition is given to the opportunities to meet the new homes requirements in the smaller settlements such as Great Bridgeford or Ranton, on or close to these transport routes which could support the services and a facilities of the KSV and main towns.

1.1.8 This policy is unduly restrictive and reduces the plans ability to meet its stated objectives of *'providing for high quality new small scale housing development at appropriate villages that reflect their distinctive local character?'* (5.2) .

1.1.9 The delivery of new homes in the rural areas should not be fettered by the Plan. Regard should be had to the ability of the rural areas to help meet the Borough's housing ambitions and to delivering a wide choice of high quality homes, widen opportunities for new home ownership and create sustainable, inclusive and mixed communities NPPF(2012: 50).

**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 policy should delete the criterion (1) which effectively requires a sequential approach to development, and the policy should set out criterion to identify that; In rural settlements not included in the KSV policy, some market housing will be allowed where this would facilitate the provision of significant additional affordable housing to meet local needs.

*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

**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**

To contribute to the discussion on the consideration of residential proposals in the rural areas.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr G & C Leese
Comment ID	PS285
Response Date	27/02/13 09:19
Consultation Point	28 Policy C5 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3

**Justified:** the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

**Do you consider that the Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Justified

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

*[The paragraphs below (down to the dotted line) are to form part of each subsequent representation made on each differing Policy, inter alia, in the hope that they will help anybody reading the specific objection on a particular policy or paragraph to understand the context. As will be seen we have focussed on what we perceive to be the most material policy but only the Council know how they perceive their draft Plan to work and interlock. The representation/ objection therefore pertains to any policy or paragraph the Council would argue obstructs the Leese family's ability to bring forward positively the optimum design for the sustainable improvement of their home]* **Because of the importance of the matter to the individual, the fact that the point raised by our client will have implications for many others throughout the Plan period and the potential value in having these matters professionally debated if they cannot be settled beforehand by negotiation, then we would wish to appear at the examination in public (questions 8 and 9 on the standard form) A.** The Leese family are long-established business people in the area. They run an equally long-established scrap-yard/recycling centre which is an important, sustainable, facility for the area. A good spread of such facilities saves people travelling greater miles with their material for recycling (or not doing it at all). B. Mr Jeff Leese, the senior in the business, sustainably lives near his yard. In planning terms both business and dwelling are in the open countryside. However, the business exists, has to be run and managed and it is sustainable to keep it there rather than face any costs of upheaval or having to close down. C. It is equally sustainable that Mr Leese has a dwelling close by. D. To live near the



business there had to be range and choice of dwelling suiting a successful businessman who could afford to travel much further in search of a dwelling if he was not offered suitable choice in the area. Mr Leese works hard, physically - and largely outdoors - in all weathers. Amongst other things for his range and choice he wanted a rural dwelling (he will never contemplate living in a town) with some land. He wanted a comparatively easy maintenance home built to modern standards of warmth and convenience. Importantly he wanted somewhere that could be the centre for his extended family; which is of overriding importance to him. E. He found a site with an old existing dwelling on it. He bought it effectively for the dwelling rights. The old dwelling was demolished and - with permission - he constructed a new house in 1993. The house is appropriately designed with local materials and related vernacular features. F. Mr Leese wants to build a leisure suite/swimming pool for him and his family to relax in, take exercise etc of an evening or weekend; but in the warm and thus linked to the main dwelling. G. He set a designer on the job. The designer picked what seemed the appropriate location. The whole thing could have been built in a different position without any reference to planning policy under Permitted Development Rights but a wing which projected slightly forward of the principal elevation seemed appropriate to the design. H. By that nuance bringing it within the planning system Mr Leese hit up against an old, unsound policy (and an unsound interpretation). I. In short, whilst he could have built something considerably larger under his Permitted Development Rights he was hit with an apparently inflexible rule based on an interpretation of a maximum 70% increase on the original dwelling; with the original dwelling being said by the interpretation of the old policy to be the one that stood in 1948 notwithstanding the policy referring to the later dwelling if it were built after that time. Thus, in effect, he was told his allowance under the saved Plan policies had been used up years before by the rebuild. J. This policy was unsound, outdated and unfit for purpose for a wide range of reasons. We call onto this file/representation the considerable correspondence already built up trying to interpret it. If that paper needs to be repeated on this file we will send it. K. Mr Leese therefore **objects** in the strongest terms to an apparent attempt in the policies to roll forward an unjustified, and possibly even more confusing, version of the same restriction. L. **All policies which are claimed to, pertain to, or seek to justify the restriction and interpretation, are objected to** . M. Such a policy is **negatively prepared** . Indeed, it is not even prepared; it is rolled forward from an outdated Plan. The policy is **not justified** . The claimed justification for it in the old Plan has not been maintained yet the policy has and no reasonable attempted justification is shown in the wording of the Plan. **The policy will be ineffective for a range of reasons; not least that in trying to control a design question through a crude limit on volume it will often mean people build the same volume (or more) but simply do it under their PD Rights instead; without regard to design policies.** It thus fails its own objectives. The Plan is also **not consistent with national objectives as it militates against people having high quality homes or having sufficient option to look for improvable houses near their work places.** N. Finally, it appears the Authority may have made an error of law. They seem to think that a reference to any phrasing similar to "original dwelling" must inevitably attract the definition given for a specific and particular purpose in the General Permitted Development Order. My understanding is that it is not a good principle of law to seek to draw a definition in a document such as a Local Plan from a piece of subordinate legislation which does a particular job quite different from that of the Local Plan. Such a wrong approach in law might be compounded when the document being relied upon is a highly technical one likely to be unknown to most lay readers of the Plan. The position is worse for skilled technical readers. They might turn to the principal source. O. The DC Handbook could hardly be clearer at section 4.3443 dealing explicitly with the definition in the Order but ending; "*The term 'original dwelling house' may also be used in policy terms where rural dwellings are to be extended, and restrictions are placed on the percentage by which the size of a given dwelling may be increased. This matter, which has nothing to do with permitted development rights under the GPDO, is discussed further at 12.63.*" (emphasis added) P. We have put just that point to officers - that the definition in a Plan has nothing to do with the GPDO - and had it pooh-poohed. We have tried to debate it directly and gently and thus it is a sadness that we are driven to say publicly and openly that their approach is wholly wrong and evidenced so by the first place a professional was likely to turn to check views. Q. Commentary on the term when used in a policy document agrees with the approach I have tried to put to officers. The normal meaning of Original is at the time a document was adopted unless there is a definition to the contrary. If there has been a replacement dwelling the original dwelling is the replacement one. In the cited leading Clarke case para 17 the Inspector specifically supported an Inspector's interpretation that he "treated the original dwelling as being that which was put up in accordance with the planning permission [for replacement]."

----- Against that background it is necessary to object to the unsoundness of **POLICY C5 and all policies which might be claimed to**

**justify it** for a number of reasons. Policy N1 can do the job but requires some changes anyway to make it workable. We offer the following in the hope of assisting good decision-making in an important way: by testing the wording of the policy, and its reasoning, against a specific site likely to come forward in the Plan period.

1. The Local Plan covers the period when it is in effect. The normal understanding of an original building at the date of a Plan with an adoption date in its front of, say, 2013, will be that it means the building at the date of the Plan. These are Plans to be read by ordinary people with ordinary interpretations.
2. The Policy is inconsistent with other parts of the Plan which seek to allow for people to improve their homes and have quality homes. A simple size limit is too crude to deal with a wide range of situations.
3. Even if it were otherwise well reasoned, it would lead people to fall back on PD Rights and build without the same concern for design and quality. It would lead to artificiality in that better designs would be set aside and worse ones brought forward simply so that the latter could benefit from PD Rights. That is what the original designer recommended on the Leese site; move it to a worse position and the family could build with little regard to finer design. There is no allowance in the policy for this obvious fall back alternative.
4. At a time when the Government is seeking to boost the economy through helping people extend and improve the homes they are likely to be staying in due to the lack of mortgages and new homes being built, it is contradictory and out of line with national policy to stop people improving.
5. The history of the Leese case shows that the development control side of the Authority, and I say it with all respect but the facts are there, have been fixated by the percentage rule. It appears to have dominated discussions. They have been unwilling to listen to evidence about the normal interpretation of what an "original building" is IN A POLICY DOCUMENT. They have dragged the whole argument back to a building which ceased to exist long ago (and was-almost by definition- replaced because of its inadequacies). No PD rights were removed on the replacement consent so there is no evidence the Council were concerned to signal to the Leeses that the new house was not to be reasonably extended.
6. Most worryingly perhaps to the writer as a professional is that the percentage has become a fixation. We have seen that if looking like they might be shown to be wrong in law and interpretation on the 70% rule, officers then interpreted the second limb of the policy to say that the allowance therein (for the percentage to be overcome by good design) cannot succeed either because the design involved an extension of over 70% ! We would get costs on an appeal for such an interpretation which is legally absurd but that is no way to go on. The existing policy says that good design can suffice, yet it has been interpreted as actually being two limbs both about size. Other aspects of the design were criticised and I make no point on that. However, there is no doubt that the proportion question has also been brought back via what is supposed to be a design test. This is a bad policy with a bad history and should not be rolled forward.
7. If all designs have to be good under other policies in the Plan, there is simply no reason for rolling forward this part. The rule "if in doubt, take it out" should be followed.
8. The previous Plan justified the policy largely on the basis of attempting to keep a range of smaller dwellings in the countryside. That justification is not brought forward so the policy should not be.
9. So far as I can see the justification for retaining this policy is limited to a short phrase in 11.18 saying that it is to protect the rural character of the borough, it is bound up again with replacement dwellings, it attempts to bring in a policy definition - and a very important one which will be likely to find itself quoted at applicants although it is only in lower case - by saying that there will be a regime where things are "strictly controlled". But what is actually wanted is the perfectly reasonable objective that alterations to properties individually and cumulatively do not have an adverse impact on the character of the properties or their surroundings That can be perfectly well achieved under a design policy without the implications at 11.18 that one really should not be daring to live beyond Settlement Limits and certainly not extending your house very much if you do.
10. One last point please to be considered, learned by this writer from 40 years practice around the country. The policy is socially regressive. Such crude percentage limits end up that way. A person who has a fortune can buy a big house and extend it by a percentage which may be larger than the total volume of someone else's dwelling. In the world as it has been, and certainly as it now is, the need to extend so as to accommodate a parent, have one's children still live at home when they cannot afford anywhere else, run one's business from home, or a myriad other perfectly good social reasons come into it. The policy is both regressive and socially oppressive. It gives planning a bad name when we try to play god. We cannot envisage the range of circumstances which may arise, we have to plan positively not negatively to assist people to better their lives whilst conserving the environment (and preferably enhancing it). In this particular case Mr Leese having the house he desires for his family is sustainable not least so he can live near his work. It seems evident that the tone of the policy is that living beyond Settlement Limits somehow means one is automatically unsustainable and must be "strictly controlled". This is the kind of playing god to avoid.

**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.**

11. **What should be done** : Para 11.16 talks of the number of planning decisions made each year and ensures that the character and distinctiveness of areas are maintained because of design standards in Policy N1. That appears to be a more objective way of saying the same as is repeated with the rather sinister and catch- all "strictly controlled" in 11.18. Sometimes encouragement, design guidance, inviting people to design in ways that are not just based on pursuing their PD Rights etc., are better than Stalinist control. N1 can do the job. Policy C5 should deal with new development and replacement dwellings only. Extensions or alterations are design matters perfectly well coverable by N1. Form is more objectively and reasonably dealt with in sub criteria 'g' and 'h'. 12. The change needed to N1 is to take out the words "at a minimum". Not all developments can meet all these criteria. Many proposals will not be well connected to Public Transport for example and certainly not all can be close to community facilities. Not all places can interconnect with important routes and linkages. "At a minimum" should be replaced by "where material". 13. If this proposal is not acceptable to the Authority in initial negotiations we would have to argue it before the Inspector. A poorer fallback alternative is to keep the wording under C5C but in the second line end at the word "should" and delete everything before picking up from sub criterion (ii) to read ".... be appropriate in design and appearance to the type and character of the existing dwelling and the surrounding area".

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr G & C Leese
Comment ID	PS286
Response Date	27/02/13 09:19
Consultation Point	15 Policy E2 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

*[The paragraphs below (down to the dotted line) are to form part of each subsequent representation made on each differing Policy, inter alia, in the hope that they will help anybody reading the specific objection on a particular policy or paragraph to understand the context. As will be seen we have focussed on what we perceive to be the most material policy but only the Council know how they perceive their draft Plan to work and interlock. The representation/ objection therefore pertains to any policy or paragraph the Council would argue obstructs the Leese business' ability to bring forward positively the sustainable progress of their business or recycling of the brownfield site]* **Because of the importance of the matter to the business and its owners, the fact that the point raised by our clients will have implications for many others throughout the Plan period and the potential value in having these matters professionally debated if they cannot be settled beforehand by negotiation, then we would wish to appear at the examination in public (questions 8 and 9 on the standard form).** A. This response represents continued involvement by Leese Brothers; a long-established scrap-yard and recycling centre. Despite involvement in the Plan over previous stages they find the Plan still unsound. They are likely to be users of the Plan during its period and - despite repeatedly calling the attention of the Authority to their needs - still find it **Negatively Prepared** , internally inconsistent ( **neither Justified nor likely to be Effective** ) unable to achieve its own objectives and **out of line with National policy** . B. They were saddened that helpful discussions with an officer who was engaging with the points made at the previous stage had to be abruptly terminated when the Authority felt it must corporately push on with its overall Plan. These discussions seemed on their way to producing a sound policy. Thus these smaller businesspeople have to take further time and effort- including officer time- objecting again at this stage. Let us hope we can pick up and conclude agreement without needing to go through examination on them. C. Leeses call to attention, and onto the file, all previous representations, including attempts to produce, through their retained planning consultant, a wording which would be sound and allow the business properly to plan for the future. D.

Over the Plan period it is likely the Leese business will be faced a number of times by land use related decisions as to whether to invest further in their site; or to move this brownfield land into a new use. In this they feel they are not untypical of many businesses based outside of settlement limits but which have been there for years and are an important point of the economy; such businesses are not soundly provided for in the Plan. Clients recognise that in some of the policies the Plan has come round to recognising that there is a pre-existing pattern of important economic activity beyond settlement limits. However, what is effectively a belated recognition only of certain specific named or mapped industrial estates in E3 does not deal with the questions for the many one off businesses. E. That includes the fundamental land use issue of what one would do to recycle brownfield land beyond settlement limits if the time comes, during the Plan period, to move it to a new use. Leeses point out, once again, that the best guarantee of their being able to take proper, rational investment decisions, including compliance with advancing regulation of the important waste/recycling industry, is the knowledge that the site will have an alternative use if they risk investment now yet at some point cannot continue. F. In summary : their constant request has been that the Plan make proper due forward-thinking provision for one off business sites beyond the limits so firmly (over) emphasised by paragraph 6.65. That must include provision for the recycling of their brownfield site to a viable use. In particular the Plan policies should ensure that some beneficial use can be found readily within policy; and not as an exception because that is not planning. No use should be implicitly or explicitly ruled out and - specifically - recycling the site for housing should be included as a possibility if it is shown that future economic use is not practicable. ----- Against that background **Policies E2, E3, E4 and all other policies which may be said to contribute to reasoning on the rural economy and land use are unsound** for a number of reasons as outlined above. We offer the following in the hope of assisting good decision-making in an important way: by testing the wording of the policy, and its reasoning, against a specific site likely to come forward in the Plan period.

1. **POLICY E2** Both in paragraph 9.7 where the proposed SPD will only provide guidance on the use of "buildings" and in the Policy itself, particularly where it sets 9 sub-criteria for the "sustainable use and re-use of rural buildings" (emphasis added), **it fails adequately to deal with the fact that many industrial sites comprise land much more than they do buildings** . Such land may be formally contaminated, it certainly may need treatment, it will probably comprise a mix of hard-standings, it will not fall back to agriculture. It needs planning. A policy only dealing with buildings is not positively prepared or effective. At all appropriate places the words "land and buildings" or "land already in/ last in economic use" should be used.

2. It is not clear in Policy E2 whether the list of things to be encouraged and listed in roman numerals, is meant to be exclusive. It is actually a positively worded policy but experience suggests that if a helpful or useful suggestion came forward but which was not specific and on the list it would struggle. Almost forty years' experience show some pressured DC officers always reading such lists as exclusive. The first para of E2, before the list, should end "encouraging the following non-exclusive list of uses. These are some preferred options but no brownfield site will be left without a genuinely beneficial use."

3. In Policy E2 sub criterion 'x' to become "in exceptional circumstances, development will be allowed on Greenfield sites to help ...." There should then be a 'xi', "where no other reasonable and beneficial use can be found for a Brownfield site then housing, including Park Homes or similar, will be considered".

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr G & C Leese
Comment ID	PS287
Response Date	27/02/13 09:19
Consultation Point	28 Policy C5 ( <a href="#">View</a> )
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 Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

*[The paragraphs below (down to the dotted line) are to form part of each subsequent representation made on each differing Policy, inter alia, in the hope that they will help anybody reading the specific objection on a particular policy or paragraph to understand the context. As will be seen we have focussed on what we perceive to be the most material policy but only the Council know how they perceive their draft Plan to work and interlock. The representation/ objection therefore pertains to any policy or paragraph the Council would argue obstructs the Leese business' ability to bring forward positively the sustainable progress of their business or recycling of the brownfield site]* **Because of the importance of the matter to the business and its owners, the fact that the point raised by our clients will have implications for many others throughout the Plan period and the potential value in having these matters professionally debated if they cannot be settled beforehand by negotiation, then we would wish to appear at the examination in public (questions 8 and 9 on the standard form).** A. This response represents continued involvement by Leese Brothers; a long-established scrap-yard and recycling centre. Despite involvement in the Plan over previous stages they find the Plan still unsound. They are likely to be users of the Plan during its period and - despite repeatedly calling the attention of the Authority to their needs - still find it **Negatively Prepared** , internally inconsistent ( **neither Justified nor likely to be Effective** ) unable to achieve its own objectives and **out of line with National policy** . B. They were saddened that helpful discussions with an officer who was engaging with the points made at the previous stage had to be abruptly terminated when the Authority felt it must corporately push on with its overall Plan. These discussions seemed on their way to producing a sound policy. Thus these smaller businesspeople have to take further time and effort- including officer time- objecting again at this stage. Let us hope we can pick up and conclude agreement without needing to go through examination on them. C. Leeses call to attention, and onto the file, all previous representations, including attempts to produce, through their retained planning consultant, a wording which would be sound and allow the business properly to plan for the future. D.

Over the Plan period it is likely the Leese business will be faced a number of times by land use related decisions as to whether to invest further in their site; or to move this brownfield land into a new use. In this they feel they are not untypical of many businesses based outside of settlement limits but which have been there for years and are an important point of the economy; such businesses are not soundly provided for in the Plan. Clients recognise that in some of the policies the Plan has come round to recognising that there is a pre-existing pattern of important economic activity beyond settlement limits. However, what is effectively a belated recognition only of certain specific named or mapped industrial estates in E3 does not deal with the questions for the many one off businesses. E. That includes the fundamental land use issue of what one would do to recycle brownfield land beyond settlement limits if the time comes, during the Plan period, to move it to a new use. Leeses point out, once again, that the best guarantee of their being able to take proper, rational investment decisions, including compliance with advancing regulation of the important waste/recycling industry, is the knowledge that the site will have an alternative use if they risk investment now yet at some point cannot continue. F. In summary : their constant request has been that the Plan make proper due forward-thinking provision for one off business sites beyond the limits so firmly (over) emphasised by paragraph 6.65. That must include provision for the recycling of their brownfield site to a viable use. In particular the Plan policies should ensure that some beneficial use can be found readily within policy; and not as an exception because that is not planning. No use should be implicitly or explicitly ruled out and - specifically - recycling the site for housing should be included as a possibility if it is shown that future economic use is not practicable. Is far too prescriptive to cover all circumstances and should be generally reworded to be positive and say that such schemes can come forward, rather than demanding that every proposal meet all those criteria. In the context of ensuring there is a possibility of recycling sites like the Leeses, then it seems to be best not to refer across to C5, which raises too many complications (although some reference to having regard to any local needs assessments which have been carried out might work). It would be better that C5 be reserved for applying to Greenfield applications. The recycling of Brownfields to save pressure on Greenfields elsewhere is a sustainable aim in itself. We all know it is an aim the public expect of the planning system as people cannot see why good, productive, pleasant Greenfields are taken with Brownfields left idle. One appreciates housing may be a last option and would have to deal with the norms of development management but the overall Plan cannot be positively prepared, effective, justified in its own terms, or consistent with national policy if it is likely to leave sites, during the Plan period, with no beneficial use. It is a land use policy. It must have a policy to deal with people who are asking "what will be the land use of my site in 20 years time?"

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	J Ross Developments (Mr Nick Scott)
Comment ID	PS288
Response Date	27/02/13 16:53
Consultation Point	6.49 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Moratoriums should be used with great care and only after the reasons why the developemnt strategy has become unbalanced are clearly understood following extensive consultation with developers and land owners.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr G & C Leese
Comment ID	PS289
Response Date	27/02/13 09:19
Consultation Point	14 Policy E1 ( <a href="#">View</a> )
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 Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

*[The paragraphs below (down to the dotted line) are to form part of each subsequent representation made on each differing Policy, inter alia, in the hope that they will help anybody reading the specific objection on a particular policy or paragraph to understand the context. As will be seen we have focussed on what we perceive to be the most material policy but only the Council know how they perceive their draft Plan to work and interlock. The representation/ objection therefore pertains to any policy or paragraph the Council would argue obstructs the Leese business' ability to bring forward positively the sustainable progress of their business or recycling of the brownfield site]* **Because of the importance of the matter to the business and its owners, the fact that the point raised by our clients will have implications for many others throughout the Plan period and the potential value in having these matters professionally debated if they cannot be settled beforehand by negotiation, then we would wish to appear at the examination in public (questions 8 and 9 on the standard form).** A. This response represents continued involvement by Leese Brothers; a long-established scrap-yard and recycling centre. Despite involvement in the Plan over previous stages they find the Plan still unsound. They are likely to be users of the Plan during its period and - despite repeatedly calling the attention of the Authority to their needs - still find it **Negatively Prepared** , internally inconsistent ( **neither Justified nor likely to be Effective** ) unable to achieve its own objectives and **out of line with National policy** . B. They were saddened that helpful discussions with an officer who was engaging with the points made at the previous stage had to be abruptly terminated when the Authority felt it must corporately push on with its overall Plan. These discussions seemed on their way to producing a sound policy. Thus these smaller businesspeople have to take further time and effort- including officer time- objecting again at this stage. Let us hope we can pick up and conclude agreement without needing to go through examination on them. C. Leeses call to attention, and onto the file, all previous representations, including attempts to produce, through their retained planning consultant, a wording which would be sound and allow the business properly to plan for the future. D.

Over the Plan period it is likely the Leese business will be faced a number of times by land use related decisions as to whether to invest further in their site; or to move this brownfield land into a new use. In this they feel they are not untypical of many businesses based outside of settlement limits but which have been there for years and are an important point of the economy; such businesses are not soundly provided for in the Plan. Clients recognise that in some of the policies the Plan has come round to recognising that there is a pre-existing pattern of important economic activity beyond settlement limits. However, what is effectively a belated recognition only of certain specific named or mapped industrial estates in E3 does not deal with the questions for the many one off businesses. E. That includes the fundamental land use issue of what one would do to recycle brownfield land beyond settlement limits if the time comes, during the Plan period, to move it to a new use. Leeses point out, once again, that the best guarantee of their being able to take proper, rational investment decisions, including compliance with advancing regulation of the important waste/recycling industry, is the knowledge that the site will have an alternative use if they risk investment now yet at some point cannot continue. F. In summary : their constant request has been that the Plan make proper due forward-thinking provision for one off business sites beyond the limits so firmly (over) emphasised by paragraph 6.65. That must include provision for the recycling of their brownfield site to a viable use. In particular the Plan policies should ensure that some beneficial use can be found readily within policy; and not as an exception because that is not planning. No use should be implicitly or explicitly ruled out and - specifically - recycling the site for housing should be included as a possibility if it is shown that future economic use is not practicable. **POLICY E1** To ensure there is not conflict and the point otherwise not picked up, then it would be best if E1(f) met the point by including from line 2 "re-using existing buildings AND BROWNFIELD LAND", taking out "in or adjacent to villages" because many such opportunity sites are not. One has seen too much fruitless debate as to what 'adjacent' precisely means when one might have a redundant farm site x yards outside the Village Envelope. The Policy should end "similar principles will be applied to the important need to recycle Brownfield sites beyond Settlement Limits and it will be ensured that no Brownfield land is left without a reasonably beneficial use."

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	Mr David Bowers
Comment ID	PS290
Response Date	27/02/13 15:52
Consultation Point	2.22 Paragraph ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.5
Files	<a href="#">PS 290 M Bowers Map.pdf</a>

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

*[The paragraphs below (down to the dotted line) are to form part of each subsequent representation made on each differing Policy, inter alia, in the hope that they will help anybody reading the specific objection on a particular policy or paragraph to understand the context. As will be seen we have focussed on what we perceive to be the most material policy but only the Council know how they perceive their draft Plan to work and interlock. The representation/ objection therefore pertains to any policy or paragraph the Council would argue obstructs the Bowers family's ability to bring forward positively the optimum use of their land]* **Because this land is of such importance to the strategy for Stone both as set out in the Plan and as it should be plus the importance of the matter to the farm family, (and the potential value in having these matters professionally debated if they cannot be settled beforehand by negotiation) then we would wish to appear at the examination in public. (Questions 8 and 9 on the standard form)** The Bowers family have land at Stone which is traditional grazing land. It is now of more limited agricultural value but still produces livestock output of value to the nation. The land no longer has a farm steading. The steading to the south was converted to town uses quite some time ago. It is residual land between economic conversions of former farm buildings to the south which are already actively part of Stone town, and the rest of the town to the north and west. The use is one which does not sit well with access or recreational use. Farmers do not want people or dogs in with stock. The land includes at least four distinguishable zones of considerable importance to Plan making at Stone, none of which appear to be soundly dealt with in the Plan as drafted. A. Land at the A51 roundabout which is a potentially prime location for a range of uses including retail. Site investigations by potential purchasers of the site in recent times have indicated it could be so used without traffic or flood issues arising. This largely equates to parcel number 1011 on the **attached** plan which forms part of the representation. B. Land immediately adjacent to that site, south of the bridge, which should be part of the continuation of Green Infrastructure but is given no

purpose in the Plan. Broadly, parcels 2714 and 3421. C. Field parcels 9941, 1434, 2728, 2123, 1325 and 0922 north of the bridge, which are indicated as Green Infrastructure on the plan but where the Plan contains no mechanism for having the family bring it into any such use. D. Two parcels of land, 1085 and 0182 across the A34 that on some indicative plans appear to be shown as part of the new strategic industrial allocation, but on the more detailed Inset Plan appear to be left with no purpose, trapped between the existing edge of the industrial zone and the new strategic industry. The family, through their planning representatives now appointed, look for detailed discussions with the Borough over the period immediately following the closure of the representation period to find a proper use for all these pieces of land in line with the requirements of a sound Plan for the future of Stone as a settlement. As it is we find ourselves having to comment on the Plan draft in two ways - what should be done overall to make it sound on all 4 tests but also what it should say to express reality if it is not to soundly plan for these important parcels of land in the Town.

----- **1. Paras 2.22 - 2.24, Spatial**

**Portrait for Stone** Stone is much more than its historic core or specific buildings. Para 2.23 should say "derived, *inter alia*, from the ..." This portrait does not adequately deal with the wider town and certainly not the southern edge of the town. If the rest of the Plan is to remain unsound then it could include the words after 2.23 : "*the south of the town has an inchoate end at present and this Plan continues that with parcels of land given no planned future. Part of the Green Infrastructure area is not in public ownership and the Plan provides no way of influencing its usage. The Plan refers to the potential need for a supermarket after 2015 but ignores and fails to plan for a prime location which has been looked at for that purpose, amongst others.*" Alternatively, with proper changes in the rest of the Plan, **para 2.23** should end : "*It is equally important to plan properly for the wider settlement and, not least, the southern end of Stone. The opportunity is being taken to work with stakeholders to provide an integrated plan for the use of well-located development land above the flood plain whilst providing Green Infrastructure for the town into the foreseeable future.*"

COPY

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Rural Land Register (RLR) Map  
SBI - 111076789  
RLR/DRRO09  
Map 1/1

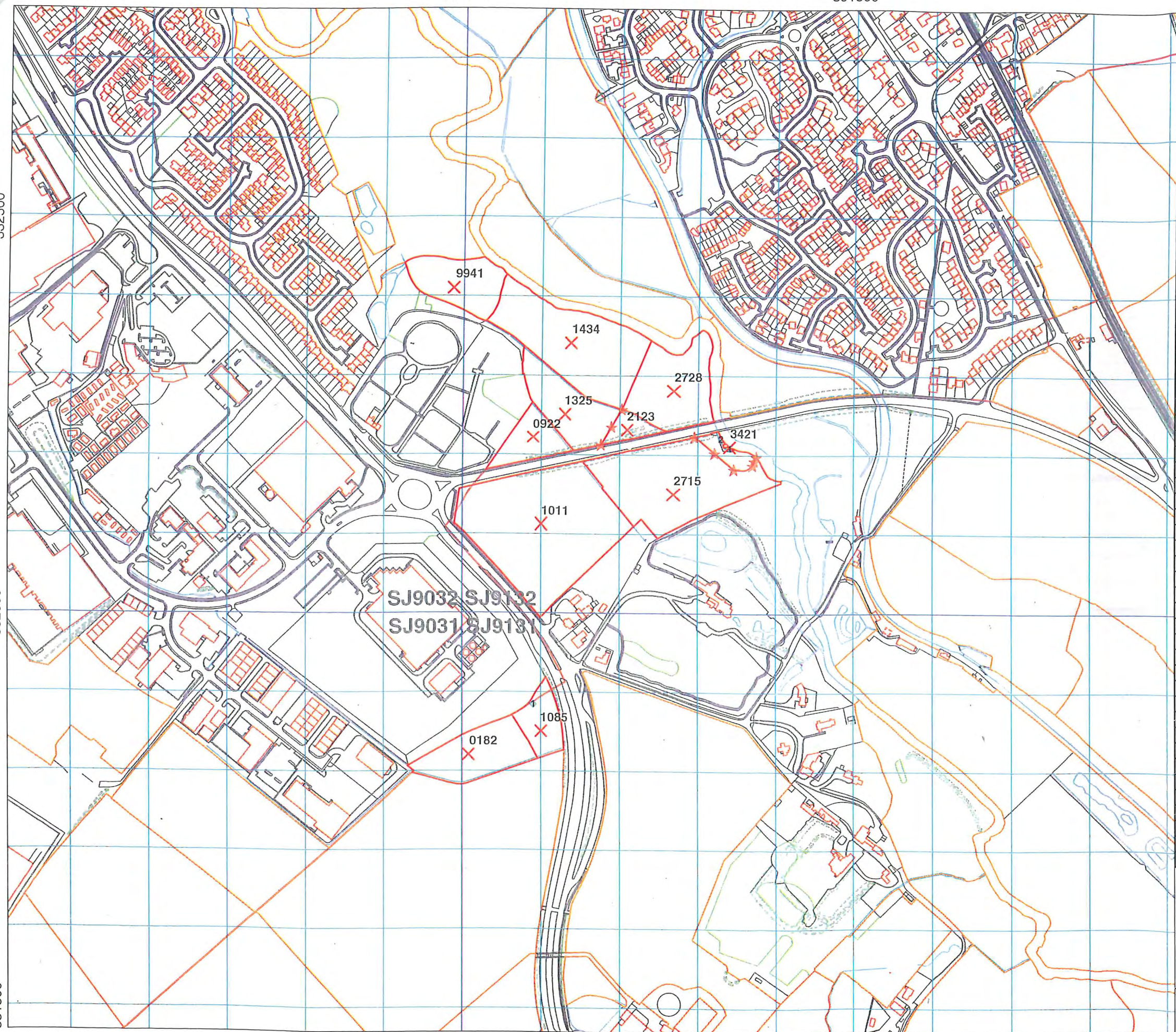
- Legends**
- Your RLR Parcel(s)
  - SPS Permanent Ineligible Features
  - Adjacent Parcel Boundary
  - \*\*\* Unconfirmed Boundary

**RLR Information**

Sheet ID	Parcel ID	Total Area (ha)	SPS Recorded Eligible Area (ha)	English Region
SJ9032	9941	0.68	0.68	N
SJ9131	0182	0.77	0.77	N
SJ9131	1085	0.37	0.37	N
SJ9132	0922	0.41	0.41	N
SJ9132	1011	2.56	2.56	N
SJ9132	1325	0.73	0.73	N
SJ9132	1434	1.62	1.62	N
SJ9132	2123	0.17	0.17	N
SJ9132	2715	1.67	1.67	N
SJ9132	2728	0.98	0.98	N
SJ9132	3421	0.15	0.14	N

332500  
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RLR/DRRO09 Date: 25/10/2009

390500 391000 391500 392000

Please return this sheet to us if you want to make any changes to the parcels shown on it.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr David Bowers
Comment ID	PS291
Response Date	27/02/13 15:52
Consultation Point	3.3 Paragraph ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

**Paras 3.3 - 3.6, National Policy** Because the southern end is not only left inadequately planned but appears to be a sustainable area at the edge of a principal settlement which is deliberately excluded from use by an unsound settlement boundary, then (if the rest of the Plan is not put right), it is necessary to insert at the end of **para 3.6** : *"The one exception is at Stone, where the rest of this paragraph is not followed. Stone is identified as an important market town with a range of needs and desires including Green Infrastructure down its canal and river corridor. However, the Plan excludes this area from the settlement boundary along with much of its job creating zones. The Plan opts not to provide strategic or detailed guidance adequate to deal with the town edge or resources within it and therefore opts to contradict all 3 economic, social and environmental roles. It deliberately creates an almost irreconcilable tension between a policy encouraging sustainable development and its strange Settlement Boundary."* If the rest of the Plan is corrected then **para 3.6** can stand as it is.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	J Ross Developments (Mr Nick Scott)
Comment ID	PS292
Response Date	27/02/13 16:59
Consultation Point	21 Policy E8 ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

We support Policy E8 and note that Eccleshall is differentiated from other rural centres underlining the importance of this centre within the local hierarchy.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	J Ross Developments (Mr Nick Scott)
Comment ID	PS293
Response Date	27/02/13 17:01
Consultation Point	11.9 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Effective

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Whilst we support the aims of this paragraph it is unclear how this is to be delivered in practice.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr David Bowers
Comment ID	PS294
Response Date	27/02/13 15:52
Consultation Point	4.1 Paragraph ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

**Para 4.1 and the Pink Box** For the reasons outlined, it is necessary, with the rest of the Plan also corrected, to say at the end of the last bullet point : *"This will mean planned development locations to use town edge land above the flood area and release riverside land to public use. Some retail use will be necessary out of historic shopping zones and this will be located away from valued natural or community assets adjacent to existing road systems."*

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr David Bowers
Comment ID	PS295
Response Date	27/02/13 15:52
Consultation Point	5.1 Paragraph ( <a href="#">View</a> )
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 Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

**Para 5.1, Spatial Vision - Stone** Unless the Plan is corrected and positive use is planned for the four areas of land, then the line in bold between **sub-paragraphs 'm' and 'n'** should be amended to read "Stone will NOT have". If the Plan were properly corrected then **sub-paragraphs n to p** can stand; otherwise they would be incorrect.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr David Bowers
Comment ID	PS296
Response Date	27/02/13 15:52
Consultation Point	5.2 Paragraph ( <a href="#">View</a> )
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 Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

**Para 5.2 Key Objectives - Stone** These objectives cannot be delivered by the Plan as drafted. Take for instance the "green infrastructure links" in objective 16. The Bowers family control that land and its continued use for commercial farming with grazing livestock means they want to exclude access. To be a centre for retail in Objective 17 a new store is needed (para 8.13) but no site is provided albeit the Bowers' link into the roundabout is the obvious choice next to the proposed work areas.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr David Bowers
Comment ID	PS297
Response Date	27/02/13 15:52
Consultation Point	1 SPATIAL PRINCIPLE 1 (SP1) - PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

**Spatial Policy SP1** This (blue) policy intends to reflect the NPPF. However, as is brought out in other parallel objections, the Settlement Boundary at Stone, apparent intentions of using a Settlement Boundary (para 6.65 read with E2) and lack of appropriate planning at the southern end of Stone, mean the policy cannot stand as it is unless the rest of the document is corrected. Sustainable land which is in reality part of Stone will be falsely regarded as open countryside. The policy as it cross-relates to the rest of the Plan at present fails all four tests of soundness and sets up irreconcilable tensions. To at least be internally consistent and consistent with NPPF for urban edge proposals Over the Plan period it would be necessary to insert : *a. In para 3 "out of date OR THE ATTEMPTED APPLICATION OF DETAILED POLICIES HEREIN WOULD CONFLICT WITH SUSTAINABILITY PRINCIPLES..." b. At end of first para insert "It is recognised in particular that this policy is needed to over-ride others because of the attempt to draw a strict settlement limit at the edge of many places, especially Stone, beyond which town edge land would otherwise be wrongly regarded as deep in the open countryside. This is not realistic. It would be planning negatively and likely to preclude worthwhile proposals being judged on their true merits."*

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr David Bowers
Comment ID	PS298
Response Date	27/02/13 15:52
Consultation Point	2 SPATIAL PRINCIPLE 2 (SP2) ? STAFFORD BOROUGH HOUSING & EMPLOYMENT REQUIREMENTS ( <a href="#">View</a> )
Status	Processed
Submission Type	Letter
Version	0.3

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

**SP2-SP5 Employment Growth Distribution** The Bowers family have land left without sound use which should contribute to employment generating use. This may be in "B" type Use Classes, or other uses. Neither SP2 nor SP5 should be unduly prescriptive and certainly should not be used to hold back positive and/or sustainable development in Stone. Whilst **para 6.56** talks about a "broad distribution of employment land" the blue policy is prescriptive. For avoidance of doubt, at the end of Policy SP5 add the words : *"Nothing in these figures should be used as an argument for holding back any consent which could be issued for otherwise desirable job creating and/or sustainable developments."*

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr David Bowers
Comment ID	PS299
Response Date	27/02/13 15:52
Consultation Point	13 POLICY STONE 2 ? WEST & SOUTH OF STONE ( <a href="#">View</a> )
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 Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

**Insets, settlement limits, key and concept diagrams and map of development to the South of Stone read with SP7 and para 6.65** The Stone inset has a black line said as the first item on the legend to be the Settlement Boundary. *Inter alia*, the line excludes both strategic allocations. It excludes the existing major industrial estates to the south, on the west of the A34 north of the industrial estates it runs through 50 % of a Green Infrastructure area, it fails to link the east and west sides of the river and canal corridor. It is a line but it is NOT a boundary to the settlement either as it is or as it should be planned to be. The line appears to contradict sentence one of 6.63 and Policy SP7. It certainly does not fit with 6.65 (which should be scrapped anyway as it attempts to make a major policy statement in a lower case para- and contradicts SP1). The line should include both sides of the town, its river corridor and go south of the buildings below clients' land which are already in economic use and providing services to the town.



## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr David Bowers
Comment ID	PS300
Response Date	27/02/13 15:52
Consultation Point	8 Stone ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

**Section 8 on Stone Town, passim** This needs to include all changes relevant and necessary to pass all 4 tests of soundness which it cannot at the moment for reasons set out above. For one example, section 8.6 et seq sets a vision for the corridor which appears to implicate the Bowers' river meadow land as its "key recommendation" yet has no deliverable plan. All policies in this section are objected to as, *inter alia*, they fail to provide a deliverable, integrated whole without a planned future for the Bowers land.

The one part supported is the reference to Westbridge Park as valuable and to be enhanced not harmed; yet rumours circulate that the Borough is favouring this land for retail or other development.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr David Bowers
Comment ID	PS301
Response Date	27/02/13 15:52
Consultation Point	21 Policy E8 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

**Retail and E8** Here the Plan seems, at the minimum, coy. There is a reference to no new edge of town facility being needed in Stafford. This seems to reflect the Stone section acknowledging the need for further retail space; but the Stone bullet point is a description not a policy. The Plan should explicitly allocate the Bowers land for retail - if necessary as part of a more comprehensive scheme.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr John Baker
Comment ID	PS302
Response Date	27/02/13 17:26
Consultation Point	9 POLICY STAFFORD 2 ? NORTH OF STAFFORD ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Justified  
. Effective

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The Strategy for the development North of Stafford appears to indicate that there is a separation and creation of an independent community rather than a development that is consistent with the town of Stafford. The Beaconside ring-road has provided a clear boundary for the town for many years. The north of Stafford allocation represents a very significant incursion into open countryside and results in a lack of clear development boundaries to the north and east. The impact of development here will be visually intrusive into the current open countryside. The current open countryside between the Beaconside Road and the small and attractive village of Hopton is much reduced by the proposed development.

In addition the Government's preferred route for HS2 will be very close to the proposed development area.

**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.**

It is suggested that the proposed development allocation is restricted to a much smaller allocation of dwellings north of the common land and the road to Marston.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Stone Festival (Mr John Sayer)
Comment ID	PS303
Response Date	27/02/13 17:30
Consultation Point	12 POLICY STONE 1 ? STONE TOWN ( <a href="#">View</a> )
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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Effective

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Policy Stone 1 provides for the 'provision of mixed use development at Westbridge Park'

The phrase 'mixed use development' is not precise - it can mean many things, and would allow any development on the Park in future years, which might not be limited to the current plans for a new food store and new leisure centre.

The extent of 'Westbridge Park' is not defined - it could be taken to mean the existing built-on area, or it could include the whole Park including the current green area.

**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 nature of the development and the physical limits of the area that are allowed to be developed should be more closely defined.

*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

**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**

To make sure that the interests (and continuation) of Stone Festival are taken into account

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr Mark Lunn
Comment ID	PS304
Response Date	27/02/13 18:37
Consultation Point	6 SPATIAL PRINCIPLE 6 (SP6) ? ACHIEVING RURAL SUSTAINABILITY ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The policy lacks detail - It does not address that rural affordability is a real problem in the borough. It fails to identify locations or policy provisions for additional entry level housing in and around not only the key villages but also minor additions to some of the smaller settlements.

There is strong evidence to indicate that younger families and those on lower than average household incomes have been priced out of the housing market in many of the Borough's villages. Villages offer a concentration of older non working age population purely because limited or no choice of small residential units.

This proposal simply concentrates on housing provision on three major allocations and does not address this issue of rural affordability. The strategy is silent on the topic and offers little provision to address the problem on a settlement by settlement basis.

**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.**

Settlements need an appropriate mix of house types and cannot be allowed to continue growing with single site large executive houses often built in gardens. This is compounding the issue of affordability and a lack of real choice (on a settlement by settlement basis). A housing mix assessment is required on a settlement by settlement basis and an appropriate plan established to rectify the problem caused by a lack of long term planning. National policy requires people to have a choice but this simply does not exist in many of our settlements.

The plan needs to provide for smaller housing units (2 bed for example) which could even be on a build to let basis to be built on the edge of development boundaries in settlements where these options are not available.

The current policy does not provide a suitable mix of properties (at a settlement level)! It do not allow residents to downsize, rent or purchase a starter home which forces people to out from there selected settlement.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr Mark Lunn
Comment ID	PS305
Response Date	27/02/13 18:40
Consultation Point	7 SPATIAL PRINCIPLE 7 (SP7) ? SUPPORTING THE LOCATION OF NEW DEVELOPMENT ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The policy lacks detail - It does not address that rural affordability is a real problem in the borough. It fails to identify locations or policy provisions for additional entry level housing in and around not only the key villages but also minor additions to some of the smaller settlements.

There is strong evidence to indicate that younger families and those on lower than average household incomes have been priced out of the housing market in many of the Borough's villages. Villages offer a concentration of older non working age population purely because limited or no choice of small residential units.

This proposal simply concentrates on housing provision on three major allocations and does not address this issue of rural affordability. The strategy is silent on the topic and offers little provision to address the problem on a settlement by settlement basis.

Settlements need an appropriate mix of house types and cannot be allowed to continue growing with single site large executive houses often built in gardens. This is compounding the issue of affordability and a lack of real choice (on a settlement by settlement basis). A housing mix assessment is required on a settlement by settlement basis and an appropriate plan established to rectify the problem caused by a lack of long term planning. National policy requires people to have a choice but this simply does not exist in many of our settlements.

**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 plan needs to provide for smaller housing units (2 bed for example) which could even be on a build to let basis to be built on the edge of development boundaries in settlements where these options are not available.

The current policy does not provide a suitable mix of properties (at a settlement level)! It does not allow residents to downsize, rent or purchase a starter home which forces people to out from their selected settlement.

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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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Miss Claire Scott
Comment ID	PS306
Response Date	27/02/13 19:28
Consultation Point	The Plan for Stafford Borough - Publication ( <a href="#">View</a> )
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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

We are concerned that the Council are proposing the development of 600 new houses on the land between Tixall Road and Weston Road in order that the prospective Developer will fund a section of the proposed Eastern bypass. The cost burden of the new section of road will be that great, in order for the Developer to fund it they will need to squeeze as many properties onto the site as possible resulting in a densely populated area which is in complete contrast to the existing properties.

If the proposed road was introduced there would be a requirement for a pedestrian crossing to be introduced to allow school children in particular to safely cross the section of the road that currently services the Fire Station. This would in turn impact traffic flow on and around the roundabout at the Weston Road/Beaconside junction as well as the proposed road and its junction with the Tixall Road.

Tixall Road, Weston Road and Blackheath Lane already suffer significantly with traffic congestion. Although the Local Council's current proposals to improve the Blackheath Lane/Weston Road junction will hopefully ease the current situation at this location, any gain would be immediately offset by the increased volume of traffic resulting from an additional 600 dwellings.

The proposed new road would not necessarily ease traffic but just move the current problem faced on Blackheath Lane to a new location. The introduction of a further 600 dwellings will have a huge negative impact on the traffic problems currently experienced in the vicinity at peak times i.e. along Weston Road and Tixall Road. Ultimately, the proposed road simply feeds onto roads that already have traffic congestion problems without the introduction of more vehicles arising from the addition of a further 600 dwellings.

We are aware that the residents of Birkdale Drive, Kingston Hill, Stafford were faced with a similar dilemma some years ago when a road linking Weston Road and Tixall Road was proposed and indeed built. It was feared that the road would become a 'rat run' for motorists and as such road bollards were introduced preventing a thoroughfare. If the proposed road is introduced, this too will provide a 'rat run' for motorists and, considering its close proximity to existing and proposed dwellings, could prove to be a danger for pedestrians including school children from the nearby Weston Road High School.

If the proposed section of road is introduced and it does result in queuing traffic, would there be a contingency plan to introduce traffic calming measures in an attempt to alleviate its use as a 'rat run' as was done in the local village of Weston, for example, or would there be the option of preventing a thoroughfare as was done with Birkdale Drive?

What is the timescale for the final section of the road to be constructed (which would ultimately link up with the Lichfield Road)? Would this actually be achievable financially? If there is no clear view of when this would be, what would be the point of increasing traffic flow in the area by the introduction of a further 600 properties? We are concerned that if the property development goes ahead, we will be left with a partially built Eastern Distributor Road that doesn't meet its full objective coupled with increased traffic congestion problems.

Many of the properties on Kensington Manor, including our own, back directly onto the proposed site. The proposed road will feed large volumes of traffic, including HGV's, past our estate from Beaconside, Weston Road and Tixall Road. What options for screening would be available to help mitigate environmental pollutions such as noise, fumes, vibration etc. from the proposed road and development. During the Local Council Consultation Meeting held on 6 th October 2011 at the Fire Station it was confirmed that the proposed road would be fully lit. This would result in light pollution for our estate, especially affecting those properties whose boundary lies next to the proposed road site, many of which are located on a naturally lower level than the proposed road. Even if the proposed road's height is reduced, the natural ground level suggests that the road will still be elevated above the existing properties which is also a great cause for concern as this will become an invasion of privacy if not adequately screened. This problem would be exasperated during times of slow or stationery traffic.

What provision will be made to ensure adequate drainage on the proposed site? Presently, there is a constant stream of running water that flows down Tixall Road from the direction of the Crematorium, across its junction with Kensington Drive and beyond during periods of rain. The water also seeps from underneath the kerb along Kensington Drive midway into the existing estate onto the carriageway. The excess surface water proves very dangerous during very cold weather when it can be hazardous as it turns to ice along roads and footpaths alike.

The adjacent estate (Kingston Manor) to the proposed site has been in existence for over 10 years. Yet, as far as we are aware, residents are still awaiting for the open spaces within this development to be adopted by the Local Council. Over the years this has resulted in several requests for the open spaces to be maintained as they had continuously been left to become overgrown and unkempt. What preventative measures are being instigated by the developers to ensure this situation will not recur on the proposed site? Even if the estate has since been adopted by the Local Council, it was still left uncared for over many years.

Currently the Crematorium grounds offer a quiet and peaceful environment. The introduction of high density housing development immediately adjacent to it would completely spoil the area for mourners and visitors alike.

The site between Kensington Drive and the Crematorium is currently arable land with a set-aside margin to encourage wildlife. The proposed development would destroy this area which would have a detrimental effect on the existing wildlife. What measures will be put in place to secure their existing habitat?

There is already a partially constructed building site in the vicinity adjacent to St Thomas Priory. Would it not be better to pursue the completion of this and other existing sites within the Stafford area before embarking on introducing yet more properties on greenfield sites?

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Please see above

*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?** No, I do not wish to participate at the examination in public

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr Roly Tonge
Comment ID	PS307
Response Date	27/02/13 22:43
Consultation Point	2.5 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Effective

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

This paragraph is nonsense. Are more or less than 1.5% of the housing stock empty for more than 6 months?

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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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr Roly Tonge
Comment ID	PS308
Response Date	27/02/13 22:47
Consultation Point	3.10 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Justified

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

But additional growth is targeted for Stone. How to you propose to stop out migration to Stone and other centres. Building less houses does not affect demand - it just forces prices higher.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr Roly Tonge
Comment ID	PS309
Response Date	27/02/13 22:48
Consultation Point	3.11 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Effective

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

I'm not sure that being compliant with the soon to be abolished RSS makes a lot of sense. Maybe the process should wait until after the RSS is actually abolished and the growth requirements for the Borough reassessed.

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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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr Roly Tonge
Comment ID	PS310
Response Date	27/02/13 22:50
Consultation Point	4.1 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Effective

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

All very well, but how does the Plan actually make provision for an ageing population?

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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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr Roly Tonge
Comment ID	PS311
Response Date	27/02/13 22:56
Consultation Point	5.2 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

We note and support in principle Key Objective 24

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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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr Roly Tonge
Comment ID	PS312
Response Date	27/02/13 23:08
Consultation Point	9.11 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Justified

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

It will be the role of the Site Allocations DPD or the Parish Plan to consider the allocation of employment land at Hixon. This paragraph preempts that by concluding that it will not be prudent to allocate land currently within the RIA boundary. This is in the erroneous belief that this land is not available. It is the case that the land has not been developed but this is as a result of a general lack of demand or acceptable offers being made. The owner of this land has been responsible for much of the past development at Hixon Airfield and has a proven track record of developing property and making land available for development. Hixon is a Key Service Village and has traditionally served as a strategic employment centre for the east of the Borough. The Plan's strategy is to strengthen these centres and the provision of suitably located employment land must be a key component of this strategy. Hixon Airfield is a well established employment area and there are clearly opportunities to maintain and extend this role over the Plan period. The site has established infrastructure. It should be noted that an outline planning application will be submitted on the land currently within the Hixon RIA shown

edged Red on the following Plan. In addition proposals to extend the Hixon RIA north-eastward to the former runway and shown edged Blue on the following plan will be proposed during the Allocations DPD and/or Parish Plan.

**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.**

This paragraph must be re-written to remove the statement that land in the existing Hixon RIA should not be re-allocated. There will be a need for a continuing and significant allocation at Hixon Airfield and the boundaries of the RIA should be assessed through the Allocations DPD or Parish Plan.

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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

**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**

Unless the Plan is amended as requested we consider that the preparation of the Allocations DPD and/or Parish Plan (and our client's interests) are seriously prejudiced and that, in this respect, the Plan is going beyond its purpose.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr Roly Tonge
Comment ID	PS313
Response Date	27/02/13 23:23
Consultation Point	2 SPATIAL PRINCIPLE 2 (SP2) ? STAFFORD BOROUGH HOUSING & EMPLOYMENT REQUIREMENTS ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Justified

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

There is no clear linkage between the amount of housing land being proposed, which is based on a growth strategy, and the amount of employment land being proposed which is based on past take-up rates. For the growth strategy to be sustainable sufficient land must be allocated to enable the expanded population to be employed locally. Alternatively the Plan should state what proportion of the new population will be expected to commute elsewhere and square this with the sustainable development objective. As 70% of growth is from in migration is it assumed that these migrants will continue to commute back to their origins for employment?



**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.**

This section requires further justification.

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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**

This issue raises the basis for the growth strategy and should be examined thoroughly.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr Roly Tonge
Comment ID	PS314
Response Date	27/02/13 23:27
Consultation Point	6.30 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Hixon is recognised as having major employment provision. The Plan should state whether this role is appropriate, whether the role should continue at current levels or be expanded.

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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



**The Plan for Stafford Borough  
Pre-Submission Consultation**

Ref:

**Representations Form**

**(For official  
use only)**

**Please return completed forms to:**

- Head of Planning & Regeneration, Stafford Borough Council, Civic Centre, Riverside, Stafford, ST16 3AQ
- or by email to [forwardplanning@staffordbc.gov.uk](mailto:forwardplanning@staffordbc.gov.uk)
- or by fax to: 01785 619473

**Responses must be received by 12 noon on Thursday 28<sup>th</sup> February 2013**

**This form has two parts:**

**Part A:** Personal Details

**Part B:** Your representations.

- Please complete Part B of this form for each representation you wish to make. You do not need to complete Part A more than once, but please ensure you state your name or organisation as applicable at the top of each Part B form you submit.
- Please refer to the attached guidance notes on making representations so that they address issues of legal compliance and / or soundness.
- Please note that when representations are submitted only Part B of the form will be published. Contact details on Part A will not be published.

# Part A

## I. Personal Details\*

\*If an agent is appointed please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

## 2. Agent's Details (if applicable)

Title	<input type="text" value="Mr"/>	<input type="text" value="Miss"/>
First Name	<input type="text" value="Sergio"/>	<input type="text" value="Rachel"/>
Last Name	<input type="text" value="Zappulo"/>	<input type="text" value="Hanbury"/>
Job Title (if applicable)	<input type="text" value="Development Manager"/>	<input type="text" value="Planner"/>
Organisation (if applicable)	<input type="text" value="REG Windpower"/>	<input type="text" value="Turley Associates"/>
Address Line 1	<input type="text"/>	<input type="text" value="9 Colmore Row"/>
Address Line 2	<input type="text"/>	<input type="text" value="Birmingham"/>
Address Line 3	<input type="text"/>	<input type="text"/>
Address Line 4	<input type="text"/>	<input type="text"/>
Postcode	<input type="text"/>	<input type="text" value="B3 2BJ"/>
Telephone Number	<input type="text"/>	<input type="text" value="0121 233 0902"/>
E-mail address	<input type="text"/>	<input type="text" value="rhanbury@turleyassociates.co.uk"/>

## Part B – Please use a separate sheet for each representation

Name or Organisation	REG Windpower
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**3. What part of The Plan for Stafford Borough (including the Policies Maps document) does your comment relate to?**

e.g. Policy Reference, Paragraph, Map title	Policy N3 and Map (page 105)
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*If your comment does not relate to a specific part of the document, or it relates to a different document, for example the Sustainability Appraisal, please make this clear in your response.*

**4. Do you consider that the Plan for Stafford Borough is:**

- a. Legally compliant\*?**  
 Yes  No
- b. Sound\*?**  
 Yes  No

*To check a box when completing this form electronically, double click on it and select 'checked' under default value.  
 \*Please refer to the attached note for guidance on legal requirements and soundness.*

*If you have entered **No** to Q4.b. please continue to Q5. In all other circumstances please go to Q6.*

**5. Do you consider The Plan for Stafford Borough is unsound because it is not:**

- a. Positively Prepared
- b. Justified
- c. Effective
- d. Consistent with national policy

**6. Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Policy N3:  
 REG Windpower welcomes the general support for renewable energy development within policy N3 but considers that it is too prescriptive on the level of impact that is acceptable from development schemes. For example, it implies that proposals causing anything greater than a limited adverse effect on the surrounding landscape or townscape character, will not be permitted. The policy should be reworded to emphasise that applications will be approved if their impacts are (or can be made) acceptable, regardless of the level of impact that the proposal is anticipated to have without mitigation. As currently worded, the policy is unsound as it is not consistent with paragraphs 97 and 98 of the National Planning Policy Framework.

The final sentence in policy N3 should be deleted because it duplicates national planning policy and is therefore unnecessary.

Map shown on page 105:

The map on page 105 of the document sets out the boundaries of sites with opportunities for wind energy development. This is based on a GIS study to map possible constraints to wind development and determine areas that are considered suitable for wind development. Whilst this approach provides a high level indication of suitable areas, it is not clear what purpose this map serves. REG Windpower considers that the map could be misinterpreted as a rigid locational guide for onshore wind farms while excluding sites where appropriate, site-specific assessment, including formal EIA, could identify wind development that would be viable and could be delivered without unacceptable impacts.

While the map on page 105 is included within the Local Plan, it is considered to be unsound because it unnecessarily restricts, and does not maximise, opportunities for renewable and low carbon energy development as required by paragraph 97 of the National Planning Policy Framework, and is therefore not consistent with national policy. REG Windpower requests that the map be removed from the Local Plan on this basis.

(attach separate sheets as necessary)

**7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough legally compliant or sound, having regard to the test you have identified at question 5. You will need to say why this change will make the document legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Policy N3 should be amended as follows:

*Development of schemes for the generation of renewable energy resources and initiatives for a low carbon economy, will be supported provided that:*

- a. The technology is suitable for the proposed location, ~~does not cause harm to~~ **and impacts on** residential amenity, the significance of heritage assets and their setting and ~~has limited adverse effects on~~ the surrounding landscape and townscape character **are (or can be made) acceptable;***
- b. Levels of noise, overshadow, flicker (associated with some wind turbines), or other harmful emissions are minimised and there is no adverse effect on public safety;*
- c. ~~The technology does not affect~~ **Any impact on the integrity of locally, nationally and internationally designated sites is (or can be made) acceptable;***
- d. Every proposal is accompanied by decommissioning conditions and the ability to ensure restoration of the site following cessation of energy production.*

*In areas where other renewable energy schemes are in operation, the cumulative effect of additional developments will be an important factor that will be taken into consideration. ~~Large scale renewable energy proposals should deliver economic, social and environmental benefits that are directly related to the proposed development.~~*

The map on page 105 should be removed from the Plan. Without prejudice to this view, if Stafford Borough Council are minded to retain the map with the Local Plan, REG Windpower strongly suggest that the criteria used to produce the map are provided (as per footnote 17 to paragraph 97 of the NPPF) and that the following reference is added:

*'This map is provided for information only, to assist in identifying suitable sites for renewable energy, and will not be used against development proposals for renewable energy that come forward in areas outside of the boundaries defined on the map.'*

(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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Inglewood Investment Company Ltd ( )
Comment ID	PS316
Response Date	28/02/13 08:41
Consultation Point	The Plan for Stafford Borough - Publication ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

**The following sets out the complete representation. It is repeated as a whole or in part at relevant sections of this Consultation Document.**

**Basis for Representation :**

It is considered that the following representation meets the 'national rules' in that it demonstrates that aspects of the plan:

- . have not been '**positively prepared**' i.e. the policies engender uncertainty and will deter development.

- . Are not adequately **?justified'** in that they require the delivery of policy and plans beyond the power of SBC to deliver and with little sign of delivery (at this time) by those who are involved. Therefore, it is potentially not **?consistent'** with National Policy
- . Are not deliverable for the above reasons and therefore the Plan is not **?effective'** .
- . May not therefore be **legally compliant** .

Specifically;

- . The Housing Provision appears to be based on outdated figures and the aspiration for delivery is unrealistic in the context of recent completions (as reported in the document) in the current climate.
- . there is a lack of clarity within the Plan for Stafford Borough (PSB) with respect to the inter-relationship of policies relating to 'Green Infrastructure', the implications of SANGS (as it relates to the Cannock Chase SAC and surrounding areas) and 'Environmental Infrastructure'. The resultant uncertainty as to the impacts of these policies with respect to development projects (particularly where they are within the area affected by the particular requirements in relation to the Cannock Chase SAC (e.g. SANGS) is of grave concern.

### Relevant PSB Policy References:

. Housing Provision:

Chapter 6 Development Strategy (6.1-6.54) provides the background to and basis for calculating the Housing Provision of 10000 new homes to 2031 (SP2 500 per annum). However, the Housing Provision table (post 6.54) would suggest that the SP2 requirement is unrealistic in terms of deliverability. The added uncertainty for potential site owners and developers engendered by the following policies set out in Chapter 12 and 13 can only exacerbate this.

. Green Infrastructure/SANGS/Environmental Infrastructure:

Chapter 12 - Environment; makes reference to 'green infrastructure' as a policy subject (12.1); then again, under the heading 'The Natural Environment & Green Infrastructure' (12.23).

'Green Infrastructure' is then defined and explained at 12.29-31 leading on to *Policy N4 - The Natural Environment & Green Infrastructure*. This policy seeks to protect, enhance and improve/expand the 'natural environment' and 'green infrastructure' (presumably should be upper case?) which includes (a.i.) 'Designated Sites (international, national....) i.e. including SAC; and requires (f.) 'measures to mitigate and/or compensate' for impacts 'through establishment of replacement habitats or features'; and later (k.ii.), provision of a 'variety of spaces to meet the needs of people and nature'.

Under the heading 'Sites of Nature Conservation Importance' *Policy N5 - Sites of European, National & Local Nature Conservation Importance* deals with amongst other designations SAC (explained at 12.33) and applies requirements and restrictions on developments having direct or indirect effects (air quality, water etc) including requiring developers to 'protect and enhance the site's ecological value. It is appreciated that LPAs have a responsibility to seek, under the NERC Act, enhancement of SSSI (and international sites) (i.e. as a S28g Authority). Protection is obviously the right thing but with respect in particular to indirect effects developers are not always in a position to enhance the value of such sites where they have no direct control over the land and its management.

Under the heading *Cannock Chase SAC* the background to the specific concerns relating to that SAC is briefly set out as the introduction to Policy N6 - Cannock Chase SAC. This policy appears to set out the basis for SANGS but no specific reference is made to this?

Chapter 13 - Infrastructure; refers to an Infrastructure Delivery Plan and lists 'Environmental Infrastructure' as a category of infrastructure requirements (13.3). However, under the heading Environmental Infrastructure (13.16 & 17) only 'green infrastructure' (should be upper case?) and its focus on the Cannock Chase SAC are dealt with. SANGS is introduced as one of a 'package' of mitigation measures and vaguely linking these to other uses of green infrastructure; and referring to the *production of an agreed delivery plan* that 'will be achieved'. To be agreed the delivery plan needs to fit the requirements of the SAC and address the pressures from all the effected local districts, not just this authority. There is little evidence that this agreement is being progressed therefore to base policy on the potential is flawed.

There is reference (13.23) to 'Green Infrastructure including SANGS provision' as being one of the infrastructure requirements that are 'capable of being met within the timescales required'? This without

an agreed delivery plan and no clear proposals to base such a claim on. This is demonstrated by the lack of information included in the table (13.24) wherever Green Infrastructure and SANGS are mentioned.

**Assertion in the light of the above :**

Inclusion of SANGS policies, whilst in principle entirely appropriate and laudable, is premature due to the absence of the detail on which to base an assessment of the likely impact on the viability of development schemes. It is considered that the basis of applying protection area around the SAC and the basis for calculating the mitigation/compensation requirements should be a matter for local debate not merely transferred from other areas where this has been applied. A strategy for offsetting the potential impacts upon the Chase SAC is needed but this must be targeted and focussed on addressing the impacts of the development in a proportionate way. SANGS may well be part of the package but it is part of a suite of measures that need to be adopted as a wider joined up strategy. On site SANGS may work well if delivered within large scale developments but smaller scale developments may struggle to provide a suitable resource and as such a more holistic approach is required i.e. a strategic SANGS funded by developer contributions may be necessary so as not to inhibit smaller scale development opportunities.

The uncertainty engendered by the above will result in a state of paralysis amongst developers and the effective sterilisation (in development terms) of large areas of the Borough until such time as the detail is available, has been appropriately consulted on and the impacts on viability assessable.

Irrespective of the lack of detail with respect to SANGS, it is unclear whether requirements for 'mitigation and/or compensation' are cumulative or interchangeable between the policies. If, for example, SANGS is met does this absolve the development from other 'Green Infrastructure' requirements in other policies? A clear policy statement is required to provide clarity on this 'double counting' risk.

With regard to the Housing Provision, the above uncertainty can only exacerbate the depressed completions record and add to the likelihood that the Provision will be increasingly undeliverable.

**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.**

Revised wording would not address the failings in the Plan. Further action and progress is required to validate the existing wording.

A realistic assessment of the Housing Provision and in particular the deliverability of the Provision is required.

Significant progress in developing the Green Infrastructure/SANGS/Environmental Infrastructure policies (and achieving agreement on among the relevant Authorities) and consulting and disseminating information on how it will work to enable its affects to be factored into the schemes necessary to deliver the Housing Provision.

*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

**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 implications of the failings identified above are focussed on two specific policy areas nevertheless we would suggest they have a significant bearing on the Plan as a whole. The opportunity to examine the basis of the Housing Provision and the progress with the Green Infrastructure/SANGS/Environmental Infrastructure policies to determine the likelihood of delivery in both cases would be an appropriate matter for the EiP.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd ( )
Comment ID	PS317
Response Date	28/02/13 08:59
Consultation Point	2.2 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The representation of the spatial influences of neighbouring local economic areas is generally supported. Of course regional economies, local economic areas and Travel to Work areas do not have clear boundaries and spatial influences in the Borough could be presented in terms of local, sub-regional, regional, national, international and indeed global scales. The limitations of a two-dimensional diagram are accepted and it is agreed in this context that there is greater interaction between the market of town of Stone with Stafford and the Birmingham City region than there is with North Staffordshire. Commuting patterns in terms of TTWA as one measure indicate a limited interface between Stone and North Staffordshire and it is agreed that development in Stone would be unlikely to substantially undermine regeneration initiatives in North Staffordshire.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd ( )
Comment ID	PS318
Response Date	28/02/13 09:00
Consultation Point	2.24 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The recognition of the market town of Stone as a focus of retail, commercial activity and employment is supported.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd ( )
Comment ID	PS319
Response Date	28/02/13 09:01
Consultation Point	5.2 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The key objectives are supported in particular points 13, 15 and 19.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd ( )
Comment ID	PS320
Response Date	28/02/13 09:03
Consultation Point	6.4 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Positively prepared  
. Justified

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

It is not accepted that the WMRSS Examination was conclusive in its assessment of the housing provision figure in Stafford Borough. The report of the Panel indicates that much of the justification behind the allocation for Stafford Borough was based on assessment of development capacities in Stafford town and the ability to deliver major urban extensions rather than a detailed consideration of local housing need or any investigation of the capacity to successfully accommodate development elsewhere in the Borough.

[www.wmr.gov.uk/Planning\\_and\\_Regional\\_Spatial\\_Strategy/RSS\\_Revision/RSS\\_Revision\\_Phase\\_2/RSS\\_Revision\\_Phase\\_2.aspx](http://www.wmr.gov.uk/Planning_and_Regional_Spatial_Strategy/RSS_Revision/RSS_Revision_Phase_2/RSS_Revision_Phase_2.aspx)

In terms of impact of housing development in Stafford Borough on North Staffordshire there is not a widely held view that it will impact on the ability of the conurbation to attract investment and regenerate. A reading of the Panel Report in the context of WMRSS will reveal this is a view purported and advocated by Stoke City Council in isolation. There is little if any evidence that housing development

in Stone (for example) would be of significant detriment to the regeneration and economic success of North Staffordshire.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd ( )
Comment ID	PS321
Response Date	28/02/13 09:03
Consultation Point	3 SPATIAL PRINCIPLE 3 (SP3) ? STAFFORD BOROUGH SUSTAINABLE SETTLEMENT HIERARCHY ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The recognition of the market town of Stone in the settlement hierarchy is welcomed.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd ( )
Comment ID	PS322
Response Date	28/02/13 09:05
Consultation Point	6.24 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The recognition of the market town of Stone in the settlement hierarchy is welcomed and supported. It is not accepted that housing development in Stone would have a significant impact on regeneration initiatives in North Staffordshire. It is noted in this context that as part of the Plan strategy the Borough has sought to limit development in the villages of Yarnfield, Barlaston and Tittensor that lie within the Green Belt of the North Staffordshire conurbation. This approach is agreed with as a pragmatic attempt to support major public investment in the North Staffordshire while recognising the bluntness of development planning as effective regeneration tool.

There is substantive evidence that many of the more rural villages around the conurbation are sought after for aspirational residences of the more economically successful in North Staffordshire. If

regeneration and investment in attractive residential environments can be achieved in North Staffordshire no doubt some of the population who would further contribute to a virtuous circle of regeneration and economic success could be retained.

The logic to the spurious application of this approach to restrict development in Stone and subject the restriction to a wholly arbitrary future date of 2021 is not accepted. It is not considered that Stone has the same inter-relationship with North Staffordshire and that new residential development would act as a drain to attract the young, aspirational, creative and entrepreneurial people that Stoke-on-Trent and Newcastle-under-lyme need to retain.

New desirable residential development in Stone could assist the regeneration of North Staffordshire by providing a residential retreat for the entrepreneurs and business people that the North Staffordshire Economic Agencies are trying to attract.

It is contended that the concern about the undermining of urban regeneration initiatives in paragraph 6.24 is more relevant to inward economic investment (and major employment sites) than to housing provision.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd ( )
Comment ID	PS323
Response Date	28/02/13 09:07
Consultation Point	6.24 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The recognition of the market town of Stone in the settlement hierarchy is welcomed and supported. It is not accepted that housing development in Stone would have a significant impact on regeneration initiatives in North Staffordshire. It is noted in this context that as part of the Plan strategy the Borough has sought to limit development in the villages of Yarnfield, Barlaston and Tittensor that lie within the Green Belt of the North Staffordshire conurbation. This approach is agreed with as a pragmatic attempt to support major public investment in the North Staffordshire while recognising the bluntness of development planning as effective regeneration tool.

There is substantive evidence that many of the more rural villages around the conurbation are sought after for aspirational residences of the more economically successful in North Staffordshire. If

regeneration and investment in attractive residential environments can be achieved in North Staffordshire no doubt some of the population who would further contribute to a virtuous circle of regeneration and economic success could be retained.

The logic to the spurious application of this approach to restrict development in Stone and subject the restriction to a wholly arbitrary future date of 2021 is not accepted. It is not considered that Stone has the same inter-relationship with North Staffordshire and that new residential development would act as a drain to attract the young, aspirational, creative and entrepreneurial people that Stoke-on-Trent and Newcastle-under-lyme need to retain.

New desirable residential development in Stone could assist the regeneration of North Staffordshire by providing a residential retreat for the entrepreneurs and business people that the North Staffordshire Economic Agencies are trying to attract.

It is contended that the concern about the undermining of urban regeneration initiatives in paragraph 6.24 is more relevant to inward economic investment (and major employment sites) than to housing provision.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd ( )
Comment ID	PS324
Response Date	28/02/13 09:10
Consultation Point	6.24 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Effective

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Paragraph 6.24 in the context of the Colin Buchanan Infrastructure Delivery Plan report, July 2012 recognises the relatively unconstrained background to the physical infrastructure required to support further development in Stone. The issue of transport infrastructure is not covered in detail and it should be recognised that the transport network, both road and rail, in Stone is well serviced and relatively uncongested. Stone does not suffer with the same restrictive highway capacities as does Stafford and provided housing, employment and retail and town centre facilities are planned and implemented together there is a good opportunity to improve the conditions for self-containment. It is considered that the implications of HS2 as it might impact on development possibilities in Stone are difficult to quantify although the alignment to the west is clearly an absolute constraint in that corridor. The implications of HS2 (Phases 1 and 2) as it might impact on services on the WCML is also difficult to assess although it is suggested that Stone could benefit from improved rail services.

With more specific reference to the south-east of Stone and with reference to site SN-2 it is noted that the Colin Buchanan Infrastructure Delivery Plan report, July 2012 comments that development could be delivered in the long-term without the need for a new railway crossing, subject to further detailed investigation of possible local highway infrastructure improvements.

There are a number of potential improvements that could be made to the B5027 to improve traffic flow and address road safety should an allocation in this area be identified.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Inglewood Investment Company Ltd ( )
Comment ID	PS325
Response Date	28/02/13 09:11
Consultation Point	6 Development Strategy ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Please refer to full representation. That aspects of the plan:

- . have not been 'positively prepared' i.e. the policies engender uncertainty and will deter development.
  - . Are not adequately 'justified' in that they require the delivery of policy and plans beyond the power of SBC to deliver and with little sign of delivery by those who are involved. Therefore it is potentially not 'consistent' with National Policy
  - . Are not deliverable for the above reasons and therefore the Plan is not 'effective'.
  - . May not therefore be legally compliant.
- Specifically with reference to this Chapter;

. The Housing Provision is based on outdated figures and the aspiration for delivery is unrealistic in the context of recent completions in the current climate. Chapter 6 Development Strategy (6.1-6.54) provides the background to and basis for calculating the Housing Provision of 10000 new homes to 2031 (SP2 - 500 per annum). However, the Housing Provision table (post 6.54) would suggest that the SP2 requirement is unrealistic in terms of deliverability. The added uncertainty for potential site owners and developers engendered by the Green Infrastructure/SANGS/Environmental Infrastructure policies set out in Chapter 12 and 13 can only exacerbate this.

**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.**

Revised wording would not address the failings in the Plan. Further action and progress is required to validate the existing wording.

A realistic assessment of the Housing Provision and in particular the deliverability of the Provision is required. Significant progress in developing the Green Infrastructure/SANGS/Environmental Infrastructure policies (and achieving agreement on among the relevant Authorities) and consulting and disseminating information on how it will work to enable its affects to be factored into the schemes necessary to deliver the Housing Provision.

*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

**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**

See full representation

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Inglewood Investment Company Ltd ( )
Comment ID	PS326
Response Date	28/02/13 09:37
Consultation Point	13.24 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

**Please refer to main representation.** Aspects of the plan:

- . have not been 'positively prepared' i.e. the policies engender uncertainty and will deter development.
- . Are not adequately 'justified' in that they require the delivery of policy and plans beyond the power of SBC to deliver and with little sign of delivery by those who are involved. Therefore it is potentially not 'consistent' with National Policy
- . Are not deliverable for the above reasons and therefore the Plan is not 'effective'.
- . May not therefore be legally compliant.

Specifically, with respect to Chapter 13 - there is a lack of clarity within the Plan with respect to the inter-relationship of policies relating to 'Green Infrastructure', the implications of SANGS (as it relates

to the Cannock Chase SAC and surrounding areas) and 'Environmental Infrastructure'. The resultant uncertainty as to the impacts of these policies with respect to development projects (particularly where they are within the area affected by the particular requirements in relation to the Cannock Chase SAC (e.g. SANGS) is of grave concern.

Chapter 13 - Infrastructure; refers to an Infrastructure Delivery Plan and lists 'Environmental Infrastructure' as a category of infrastructure requirements (13.3). However, under the heading Environmental Infrastructure (13.16 & 17) only 'green infrastructure' (should be upper case?) and its focus on the Cannock Chase SAC are dealt with. SANGS is introduced as one of a 'package' of mitigation measures and vaguely linking these to other uses of green infrastructure; and referring to the *production of an agreed delivery plan* that 'will be achieved'. To be agreed the delivery plan needs to fit the requirements of the SAC and address the pressures from all the effected local districts, not just this authority. There is little evidence that this agreement is being progressed therefore to base policy on the potential is flawed.

There is reference (13.23) to 'Green Infrastructure including SANGS provision' as being one of the infrastructure requirements that are 'capable of being met within the timescales required'? This without an 'agreed delivery plan and no clear proposals to base such a claim on. This is demonstrated by the lack of information included in the **table (13.24)** wherever Green Infrastructure and SANGS are mentioned.

**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.**

**Revised wording would not address the failings in the Plan. Further action and progress is required to validate the existing wording.** Significant progress in developing the Green Infrastructure/SANGS/Environmental Infrastructure policies (and achieving agreement among the relevant Authorities) and consulting and disseminating information on how it will work to enable its affects to be factored into the schemes necessary to deliver the Housing Provision.

Inclusion of SANGS policies, whilst in principle entirely appropriate and laudable, is premature due to the absence of the detail on which to base an assessment of the likely impact on the viability of development schemes. It is considered that the basis of applying protection area around the SAC and the basis for calculating the mitigation/compensation requirements should be a matter for local debate not merely transferred from other areas where this has been applied. A strategy for offsetting the potential impacts upon the Chase SAC is needed but this must be targeted and focussed on addressing the impacts of the development in a proportionate way. SANGS may well be part of the package but it is part of a suite of measures that need to be adopted as a wider joined up strategy. On site SANGS may work well if delivered within large scale developments but smaller scale developments may struggle to provide a suitable resource and as such a more holistic approach is required i.e. a strategic SANGS funded by developer contributions may be necessary so as not to inhibit smaller scale development opportunities.

The uncertainty engendered by the above will result in a state of paralysis amongst developers and the effective sterilisation (in development terms) of large areas of the Borough until such time as the detail is available, has been appropriately consulted on and the impacts on viability assessable.

Irrespective of the lack of detail with respect to SANGS, it is unclear whether requirements for 'mitigation and/or compensation' are cumulative or interchangeable between the policies. If, for example, SANGS is met does this absolve the development from other 'Green Infrastructure' requirements in other policies? A clear policy statement is required to provide clarity on this 'double counting' risk.

*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

**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**

**See main representation**

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Inglewood Investment Company Ltd ( )
Comment ID	PS327
Response Date	28/02/13 09:39
Consultation Point	12.1 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

**See main representation for full text** . Aspects of the plan:

- . have not been 'positively prepared' i.e. the policies engender uncertainty and will deter development.
- . Are not adequately 'justified' in that they require the delivery of policy and plans beyond the power of SBC to deliver and with little sign of delivery by those who are involved. Therefore it is potentially not 'consistent' with National Policy
- . Are not deliverable for the above reasons and therefore the Plan is not 'effective'.
- . May not therefore be legally compliant.

Specifically, with respect to Chapter 12 - there is a lack of clarity within the Plan for Stafford Borough (PSB) with respect to the inter-relationship of policies relating to 'Green Infrastructure', the implications

of SANGS (as it relates to the Cannock Chase SAC and surrounding areas) and 'Environmental Infrastructure'. The resultant uncertainty as to the impacts of these policies with respect to development projects (particularly where they are within the area affected by the particular requirements in relation to the Cannock Chase SAC (e.g. SANGS) is of grave concern.

'Green Infrastructure' is then defined and explained at 12.29-31 leading on to *Policy N4 - The Natural Environment & Green Infrastructure*. This policy seeks to protect, enhance and improve/expand the 'natural environment' and 'green infrastructure' (presumably should be upper case?) which includes (a.i.) 'Designated Sites (international, national....) i.e. including SAC; and requires (f.) 'measures to mitigate and/or compensate' for impacts 'through establishment of replacement habitats or features'; and later (k.ii.), provision of a 'variety of spaces to meet the needs of people and nature'.

Under the heading 'Sites of Nature Conservation Importance' *Policy N5 - Sites of European, National & Local Nature Conservation Importance* deals with amongst other designations SAC (explained at 12.33) and applies requirements and restrictions on developments having direct or indirect effects (air quality, water etc) including requiring developers to 'protect and enhance the site's ecological value. It is appreciated that LPAs have a responsibility to seek, under the NERC Act, enhancement of SSSI (and international sites) (i.e. as a S28g Authority). Protection is obviously the right thing but with respect in particular to indirect effects developers are not always in a position to enhance the value of such sites where they have no direct control over the land and its management.

Under the heading *Cannock Chase SAC* the background to the specific concerns relating to that SAC is briefly set out as the introduction to Policy N6 - Cannock Chase SAC. This policy appears to set out the basis for SANGS but no specific reference is made to this?

**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 main representation**

Revised wording would not address the failings in the Plan. Further action and progress is required to validate the existing wording.

A realistic assessment of the Housing Provision and in particular the deliverability of the Provision is required. Significant progress in developing the Green Infrastructure/SANGS/Environmental Infrastructure policies (and achieving agreement on among the relevant Authorities) and consulting and disseminating information on how it will work to enable its affects to be factored into the schemes necessary to deliver the Housing Provision.

*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

**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**

**See main representation**

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Providence Land Limited (Mr Jonathon Harbottle)
Comment ID	PS328
Response Date	28/02/13 00:32
Consultation Point	2 SPATIAL PRINCIPLE 2 (SP2) ? STAFFORD BOROUGH HOUSING & EMPLOYMENT REQUIREMENTS ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.5

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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The figure of 500 new homes per year is seriously flawed for the following reasons: ? The serious backlog of housing underprovision over recent years has been ignored (at least 800 since 2006). Only 387 per annum have been provided 2006 - 2011. 550 dwellings per year should have been provided in this period according to the most recent objectively assessed figures available: the panel report of the Phase II revision of the RSS which was submitted to the Secretary of State in 2009 following public examination. For Stafford it identifies a requirement 2006 to 2026 of 11,000 dwellings (550 dwellings per annum). As the housing figures from 2006 onwards have been properly examined and the Government seeks to boost significantly the supply of housing, they are of significant weight in

consideration of housing land supply. ? The Plan does not anticipate the 2010-based Household Projections which are to be derived from the issued 2010-based Population Projections which show an increase for Stafford over the Plan period compared with the 2008-based Population Projections. ? None of the current projections reflect the emerging strategy for Stafford town, and its subregional Growth Point role, as set out in the Spatial Vision and Key Objectives of this Plan. This is intended to take more of the sub-regional growth than the more constrained areas, so Stafford just meeting the projected minimum is not sufficient. ? Addressing the current affordable housing crisis within the Borough does not form part of the reasoning. The previous Strategic Housing Market Assessment sought 293 dwellings annually. The annual rate 2006 - 2011 has been 51. There is consequently a significant underprovision of affordable housing (approximately 1,000 dwellings) against the established need figure and there is no attempt to justify how this backlog of underprovision should be addressed. ? The Plan does not set out an effective strategy to meet the objectively assessed needs for affordable housing over the Plan period. The updated Strategic Housing Market Assessment (2012) identifies a need for 210 new affordable homes per year. But the housing viability study found that on most sites only 30% of housing is achievable and only on sites to the west of Stafford and Stone can 40% affordable housing be achieved. Therefore, close to 700 open market dwellings per year on larger sites will need to be provided to deliver the 210 affordable homes, yet this higher rate of growth has not been tested. ? At the EiP for the Phase II RSS the Council agreed that the RSS Preferred Option figure of 10,100 should be increased by 900 to 11,000 (550 per annum). The Panel agreed with the Council that 550 per annum could be satisfactorily accommodated and recommended this annual rate, so there is no question of any adverse impact of growth that would justify a lower figure. The Council is therefore not compliant with the presumption in favour of sustainable development in paragraph 14 of the NPPF which is clear that Local Plans should meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole. Nor is the Plan consistent with paragraph 47 of the NPPF which states that that Councils should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area. Nor is the Council meeting the core planning principle in para 17 of the NPPF which states that every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth.

**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.**

Increase the annual rate to at least 550 dwelling per year and encourage higher levels of growth (up to 700 dwellings per year) in order to make every effort to objectively identify and then meet the housing needs of the Borough, and respond positively to wider opportunities for growth, as required by the NPPF.

*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

**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**

To assist the Inspector with our experience of development issues in the Borough.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Providence Land Limited (Mr Jonathon Harbottle)
Comment ID	PS329
Response Date	28/02/13 00:28
Consultation Point	6.10 Paragraph ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

1. This paragraph wrongly claims there is 6 years housing land supply. It ignores the backlog of unmet demand since 2006. There is just 3 years supply when measured against the most recent objectively assessed figures available: the panel report of the Phase II revision of the RSS which identifies a requirement of 550 dwellings per annum from 2006. To be consistent with Planning for Growth and paragraph 47 of the NPPF, it would not be sound to ignore any shortfall already created. Also it would be preferable to meet the shortfall sooner rather than later, therefore the shortfall should be redressed in the first five years of the Plan period 2011 - 2016. 2. The figure of 500 new homes per year is flawed for the following reasons:

- . The serious backlog of housing underprovision over recent years has been ignored (at least 800 since 2006). Only 387 per annum have been provided 2006 - 2011. 550 dwellings per year should

have been provided in this period according to the most recent objectively assessed figures available: the panel report of the Phase II revision of the RSS which was submitted to the Secretary of State in 2009 following public examination. For Stafford it identifies a requirement 2006 to 2026 of 11,000 dwellings (550 dwellings per annum). As the housing figures from 2006 onwards have been properly examined and the Government seeks to boost significantly the supply of housing, they are of significant weight in consideration of housing land supply.

- . The Plan does not anticipate the 2010-based Household Projections which are to be derived from the issued 2010-based Population Projections which show an increase for Stafford over the Plan period compared with the 2008-based Population Projections.
- . None of the current projections reflect the emerging strategy for Stafford town, and its subregional Growth Point role, as set out in the Spatial Vision and Key Objectives of this Plan. This is intended to take more of the sub-regional growth than the more constrained areas, so Stafford just meeting the projected minimum is not sufficient.
- . Addressing the current affordable housing crisis within the Borough does not form part of the reasoning. The previous Strategic Housing Market Assessment sought 293 dwellings annually. The annual rate 2006 - 2011 has been 51. There is consequently a significant underprovision of affordable housing (approximately 1,000 dwellings) against the established need figure and there is no attempt to justify how this backlog of underprovision should be addressed.
- . The Plan does not set out an effective strategy to meet the objectively assessed needs for affordable housing over the Plan period. The updated Strategic Housing Market Assessment (2012) identifies a need for 210 new affordable homes per year. But the housing viability study found that on most sites only 30% of housing is achievable and only on sites to the west of Stafford and Stone can 40% affordable housing be achieved. Therefore, close to 700 open market dwellings per year on larger sites will need to be provided to deliver the 210 affordable homes, yet this higher rate of growth has not been tested.
- . At the EIP for the Phase II RSS the Council agreed that the RSS Preferred Option figure of 10,100 should be increased by 900 to 11,000 (550 per annum). The Panel agreed with the Council that 550 per annum could be satisfactorily accommodated and recommended this annual rate, so there is no question of any adverse impact of growth that would justify a lower figure.

The Council is therefore not compliant with the presumption in favour of sustainable development in paragraph 14 of the NPPF which is clear that Local Plans should meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole. Nor is the Plan consistent with paragraph 47 of the NPPF which states that that Councils should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area. Nor is the Council meeting the core planning principle in para 17 of the NPPF which states that every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth.

**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.**

Set out the accurate land supply position and revise the SHLAA so that it properly tests deliverability and developability.

*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

**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**

To assist the Inspector with our experience of development issues in the Borough.



## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Canal & River Trust (Mr Ian Dickinson)
Comment ID	PS330
Response Date	28/02/13 09:54
Consultation Point	12 POLICY STONE 1 ? STONE TOWN ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Policy Stone 1- Stone Town We note that the Proposals Map defines the town centre boundary for Stone. We therefore assume that references within Policy Stone 1 to the town centre refer to the area within the defined boundary on the Proposals Map.

The Tourism section of the Policy at (ii) provides support for "canal-based regeneration initiatives in Stone town centre". This is a broad statement which could benefit from greater clarity, whether within the Policy itself or in the supporting text. It is clear that national policy and guidance contained in the NPPF considers there to be a wide range of uses that are potentially appropriate in town centres and can contribute towards their viability and vitality. Paragraph 23 of the NPPF (Bullet Point 6) identifies retail, leisure, commercial, office, tourism, cultural, community and residential development as all being appropriate, and at Bullet Point 9, highlights in particular the need to recognise the importance of residential development in ensuring the vitality of town centres, and advises LPAs to set out policies to encourage residential development on appropriate sites. Whilst we consider that the policy is sound,

we would suggest that it would be appropriate for it to include an indication that regeneration initiatives could potentially include any of these uses, for the sake of clarity.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Providence Land Limited (Mr Jonathon Harbottle)
Comment ID	PS331
Response Date	28/02/13 00:32
Consultation Point	4 SPATIAL PRINCIPLE 4 (SP4) ? STAFFORD BOROUGH HOUSING GROWTH DISTRIBUTION ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.5

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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The Key Service Villages provide a vital role in meeting day to day needs of those living in the Stafford countryside (about 40% of the Borough). They should be the focus of rural housing growth because they are in the most sustainable location and they require sustain the services that support all those living in the rural areas. With falling household size it is vital that there is housing growth to prevent falling population. Key Service Villages should receive a minimum of 20% of the housing development of the District i.e. all the rural housing growth, with the rest of the rural areas restricted to exceptions affordable housing.

The evidence of The Taylor Review of Rural Economy and Affordable Housing is relevant. This concluded as follows:

### **Housing & Economic Issues**

- . Rural population increased by 800,000 over the past ten years
- . ONS predict that that rural population will grow by 16% by 2028 compared to 9% in urban areas
- . Affordable housing need estimated a need for at least double the current rate of delivery (7,266pa)
- . Average wages in most rural areas 25% less than urban areas
- . Agriculture accounts for less than 5% of the rural workforce
- . Higher proportion of small and micro-businesses, self employment and home based working
- . At least twice as many (between 17 to 31%) rural working residents work from home compared with urban areas (8%)
- . More rural households have broadband (although often slower)

### **Travel to work patterns**

- . Urban and rural patterns very similar except rural residents more likely to commute less than 1km whereas urban trips more likely to be between 1 and 5 km
- . Greater degree of reverse commuting - workers employed in rural enterprises who cannot rent or buy locally, whilst those that can afford to live in the village commute elsewhere for work

### **Sustainable design and construction**

- . Zero emission electric cars widely available and greater proportion working from home avoids commuting and supports local services
- . Appropriate and proportionate new housing and employment development in rural areas would be no more unsustainable than in urban areas and in fact will further sustainable development by tackling reverse commuting
- . Layout, design, character and mix are key to successful schemes and should be shaped by existing residents. Avoid the mistakes of the past that sometimes saw bland housing estates that lacked quality and with no local distinctiveness or character.

**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.**

Change policy to:

In order to achieve the scale of new housing identified in Spatial Principle SP2, the annual targets for the distribution of housing development, supported by necessary infrastructure, will be: ? Stafford 72% ? Stone 8% ? Key Service Villages 20%

The Rest of Rural Area should accommodate solely exceptions affordable housing which shall be additional to the annual targets, given the serious backlog of underprovision of affordable housing which is evident at the start of the Plan period.

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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

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To assist the Inspector with our experience of development issues in the Borough.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Canal & River Trust (Mr Ian Dickinson)
Comment ID	PS332
Response Date	28/02/13 10:01
Consultation Point	20 Policy E7 ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Justified  
. Effective

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Policy E7- Canal Facilities and New Marinas The Trust is concerned that whilst the policy is generally appropriate and supportive of canal-related development, it is unduly restrictive with regard to criterion (h) relating to permanent residential moorings. The policy states that "away from settlements in the settlement hierarchy, marinas and moorings with limited service facilities will be accepted provided.... there are no permanent moorings for residential purposes".

The Trust considers that this element of Policy E7 is unsound, as it fails the tests of soundness in terms of both Justification and Effectiveness.

Justification

In relation to achieving sustainable development we understand why a restrictive approach is proposed in relation to development proposals in the countryside. We do however consider that it is unreasonable to seek to prevent any permanent residential moorings away from the settlements identified within the

settlement hierarchy, and we do not consider that this element of Policy E7 is founded on a robust and credible evidence base.

In planning terms, a residential mooring is considered to be *sui generis* use rather than a "dwelling house" under Class C3 of Town and Country Planning (Use Classes) Order 1987 (as amended). There are differences between moored boats used for residential purposes and built dwelling houses. Moored boats constitute an inherent part of the waterway scene and are far less intrusive than built housing development. Residential moorings offer an alternative form of living accommodation, and the policy does not acknowledge this, or consider the fact that inland waterways are 'non-footloose' assets; i.e. the location and alignment of waterways are fixed. Such assets have locational requirements arising from this inherent constraint, and as such, it may be the case that the settlements identified in the hierarchy will not necessarily be able to provide appropriate mooring locations, particularly as the majority of the canal network lies in rural areas beyond these settlements (some of which are, in any event, not located near to the canal network). We consider that it is important to assess each potential new residential mooring site on a case by case basis and to apply relevant "sequential" planning policies where appropriate.

We comment that this restriction precludes residential moorings within marina developments which may be specifically included to provide on-site security/management accommodation, associated with the safe and smooth operation of the marina/moorings, and again, no justification for this has been put forward.

A blanket restriction on all permanent residential moorings has not been justified either within the policy or the supporting text. This requirement does not appear to have been subject to any consultation as it did not appear in the draft publication document nor does there appear to be any detailed examination to underpin it.

#### Effectiveness

The majority of the canal network within the Borough lies beyond the settlements identified in the settlement hierarchy and consequently the automatic exclusion of permanent residential moorings in all circumstances beyond these settlements restricts the ability to consider permanent residential moorings to a very small proportion of the network. The inclusion of this restriction risks the prospect of Policy E7 not being effective in delivering its aims, as it makes no provision for considering the merits of residential moorings in most locations, or to allow exceptions to be made to the restriction on their inclusion within developments on most of the canal network, and is thus insufficiently flexible to be able to deal with changing circumstances, or the inherent constraints presented by the canal network being fixed in its location and alignment.

**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.**

Proposed changes Criterion (h) of Policy E7 should be amended so that the policy reads as follows:

"Away from settlements in the settlement hierarchy, marinas and moorings with limited service facilities will be accepted provided....

(h) it can be demonstrated that any proposed permanent residential moorings are required specifically in association with the operation of the development or that there are specific circumstances justifying their provision, taking account of the nature, scale and location of the development."

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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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Providence Land Limited (Mr Jonathon Harbottle)
Comment ID	PS333
Response Date	28/02/13 00:32
Consultation Point	6.50 Paragraph ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The Strategic Housing Land Availability Assessment is flawed: it does not assess deliverability or developability correctly and includes many sites where ownership is unknown and viability unproven. It does not show that there is more than a sufficient supply of housing land available to actually achieve the proposed distribution.

**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.**

Amended SHLAA to be prepared by the Council and the Plan to cross-refer to its key findings.

*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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To assist the Inspector with our experience of development issues in the Borough.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Providence Land Limited (Mr Jonathon Harbottle)
Comment ID	PS334
Response Date	28/02/13 00:32
Consultation Point	6.54 Paragraph ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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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The Key Service Villages provide a vital role in meeting day to day needs of those living in the Stafford countryside (about 40% of the Borough). They should be the focus of rural housing growth because this sustains the services that support all those living in the rural areas. They should receive a minimum of 20% of the housing development of the District i.e. all the rural housing growth, with the rest of the rural areas restricted to exceptions affordable housing.

**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 table should show new provision of 1629 for the Key Service Villages, in order to reflect a total requirement of 2,200 (20% of 11,000).

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## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr Ivor Caplan
Comment ID	PS335
Response Date	28/02/13 10:06
Consultation Point	1.17 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy is Legally compliant?** Yes

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The Residential Boat Owners' Association objects to the new condition introduced in Policy E7 limiting the introduction of new residential moorings away from settlements. RBOA considers that this restriction is not justified and is inconsistent with National Policy.

National Planning Policy requires local plans to take account of residential communities including those who live on the canals and rivers. The Housing Ministers has endorsed this by confirming that the New Homes Bonus for local authorities applies to properly established residential moorings. The RBOA has established with government National Policy encouraging the provision of residential moorings in all marinas. It should be noted that all boats within the area of the Plan are of traditional narrow boat dimensions capable of navigating these waterways. These should not be confused with 'houseboats' which are generally larger and nor capable of propulsion.

The following benefits of including residential moorings in marina developments are well established with local authorities and navigation authorities-

Meeting an existing and rapidly increasing demand for secure moorings, both long and short term, for residential craft

Providing lower-cost homes in the Local Authority Area

Contributing to the local economy

Providing a visible presence within a marina, and thereby increasing security

Offering on-the-spot action in emergency situations (such as alerting emergency services in the case of accident, illness, fire, etc.)

Noticing any sudden changes to water levels, and reporting this to British Waterways and Marina Operators

Being able to assist visitors or those newly moved to the area or new to boating with their local knowledge (shops, facilities, etc.)

Taking a pride in the appearance of their boat and its surroundings, so presenting a pleasant aspect to others

Bringing colour to the area, giving local residents and visitors to the area some insight into the traditions and heritage of our waterways

Helping the environment by aspiring to lead an eco-friendly lifestyle.

Residential moorings are sustainable, of low environmental impact and less permanent than their housing counterparts. The RBOA maintains that most of the planning restrictions that apply to built housing should not be applied to residential boats and their moorings which are a natural part of the waterways environment.

The provision of well designed and managed residential moorings in marinas can assist in addressing the problem of more itinerant moorings on the towpath which can be detrimental to the environment of the waterways and their enjoyment by all.

**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 RBOA considers that any restriction on the provision of residential moorings in marinas away from existing settlements should be removed.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr Ivor Caplan
Comment ID	PS336
Response Date	28/02/13 10:06
Consultation Point	1.17 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy is Legally compliant?** Yes

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National Planning Policy requires local plans to take account of residential communities including those who live on the canals and rivers. The Housing Ministers has endorsed this by confirming that the New Homes Bonus for local authorities applies to properly established residential moorings. The RBOA has established with government National Policy encouraging the provision of residential moorings in all marinas. It should be noted that all boats within the area of the Plan are of traditional narrow boat dimensions capable of navigating these waterways. These should not be confused with 'houseboats' which are generally larger and nor capable of propulsion.

The following benefits of including residential moorings in marina developments are well established with local authorities and navigation authorities-

Meeting an existing and rapidly increasing demand for secure moorings, both long and short term, for residential craft

Providing lower-cost homes in the Local Authority Area

Contributing to the local economy

Providing a visible presence within a marina, and thereby increasing security

Offering on-the-spot action in emergency situations (such as alerting emergency services in the case of accident, illness, fire, etc.)

Noticing any sudden changes to water levels, and reporting this to British Waterways and Marina Operators

Being able to assist visitors or those newly moved to the area or new to boating with their local knowledge (shops, facilities, etc.)

Taking a pride in the appearance of their boat and its surroundings, so presenting a pleasant aspect to others

Bringing colour to the area, giving local residents and visitors to the area some insight into the traditions and heritage of our waterways

Helping the environment by aspiring to lead an eco-friendly lifestyle.

Residential moorings are sustainable, of low environmental impact and less permanent than their housing counterparts. The RBOA maintains that most of the planning restrictions that apply to built housing should not be applied to residential boats and their moorings which are a natural part of the waterways environment.

The provision of well designed and managed residential moorings in marinas can assist in addressing the problem of more itinerant moorings on the towpath which can be detrimental to the environment of the waterways and their enjoyment by all.

**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 RBOA considers that any restriction on the provision of residential moorings in marinas away from existing settlements should be removed.

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No, I do not wish to participate at the examination in public



## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Providence Land Limited (Mr Jonathon Harbottle)
Comment ID	PS337
Response Date	28/02/13 00:32
Consultation Point	6.55 Paragraph ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

1. The Strategic Housing Land Availability Assessment is flawed: it does not assess deliverability or developability correctly and includes many sites where ownership is unknown. It does not show that there is more than a sufficient supply of housing land available to actually achieve the proposed distribution.

2. The latest 5 year housing land statement for Stafford Borough is flawed. It does not demonstrate that there is more than 6 years supply of land for new houses. When measured against the latest evidence on housing requirements, there is only 3 years supply. Therefore the strategy of the Plan needs to respond positively to this shortfall with measures to significantly boost housing in the early parts of the Plan period.

**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.**

Amended SHLAA and housing land statement to be prepared by the Council and the Plan to cross-refer to their key findings.

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To assist the Inspector with our experience of development issues in the Borough.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Providence Land Limited (Mr Jonathon Harbottle)
Comment ID	PS338
Response Date	28/02/13 00:32
Consultation Point	11.8 Paragraph ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

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**Do you consider The Plan for Stafford Borough is unsound because it is not:**

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**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The Plan does not set out an effective strategy to meet the objectively assessed needs for affordable housing over the Plan period. The updated Strategic Housing Market Assessment (2012) identifies a need for 210 new affordable homes per year. But the housing viability study found that on most sites only 30% of housing is achievable and only on sites to the west of Stafford and Stone can 40% affordable housing be achieved. Therefore, close to 700 open market dwellings per year on larger sites will need to be provided to deliver the 210 affordable homes that are needed, yet this higher rate of growth has not been tested. The phrase "Where the evidence identifies that a higher percentage of affordable housing can be achieved, this will be sought" will be ineffective in meeting the identified needs. Instead, sufficient market housing will need to be built to cross-subsidise the affordable units.

**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.**

Increase the housing numbers for the whole Plan to close to 700 per year. This will deliver 30-40% affordable units on the larger sites which enable the identified housing need to be met as required by the NPPF.

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## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	HCA (Miss Vicky Bodman)
Comment ID	PS339
Response Date	28/02/13 10:15
Consultation Point	The Plan for Stafford Borough - Publication ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

I am writing to you in regard of the current Stafford Borough Plan, with particular interest in affordable housing as a representative of the Homes and Communities Agency.

In regards to the Communities section which looks specifically at Affordable Housing. I believe that 40% affordable housing for Stone, Eccleshall, Gnosall, Woodseaves, Barlaston, Tittensor and Yarnfield is appropriate with 30% for Stafford town and all other areas of the Borough.

I commend the council for setting these percentages for the area however; it may be beneficial to state the split of the tenure for the affordable units. It could explain that a % of the affordable units are for affordable rent and a % for affordable homes ownership.

As size standards are now being defined by the Local Authorities, it may be of benefit for the Borough Council to state space standards for 1 bed apartments. It is important that these units are sustainable for the future.

I am glad to see that it is recognised that provision needs to be provided for Gypsies, Travellers and Travelling Show people. I take it that the numbers needed will be presented in a later document once a needs assessment is complete.

Also, In Policy Stafford 1 ? Stafford Town, it talks about Tourism and in section ii states that you will ?ensure new developments are well designed and of high quality whilst respecting the character of the townscape and skyline, and conserving sight lines to historic building and their setting.? I believe this is of particular importance as the historical element of Stafford Town is its unique selling point and new development should be in line with this.

The statutory objectives of the HCA, as contained in the Housing and Regeneration Act 2008 are:

- . To improve the supply and quality of housing in England;
- . To secure the regeneration or development of land or infrastructure in England;
- . To support in other ways the creation, regeneration or development of communities in England or their continued well-being; and
- . To contribute to the achievement of sustainable development and good design in England, with a view to meeting the needs of people living in England.

The HCA have primarily been working with the Borough Council on affordable housing with ATLAS working on the Strategic Development Location at Burleyfield. The latter engagement is ongoing and not part of the formal duty to co-operate.

*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

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28 February 2013

Dear Sirs

## **THE PLAN FOR STAFFORD BOROUGH PRE SUBMISSION CONSULTATION**

We write on behalf of Seddon Homes Limited (SHL) in response to consultation on the Pre Submission Plan for Stafford Borough.

SHL is currently promoting development of land east of Stone and an application is pending determination by the Council for a small scale proposal of up to 34 dwellings on a greenfield site on the edge of the settlement boundary (Application Ref: 12/17800/OUT). However, SHL also have a number of other site interests in the area including at Trent Road and Newcastle Road, both to the west of the town (see enclosed plan). It is against this context that their comments are made.

For the avoidance of doubt, this letter should be read alongside comments submitted previously; a copy of the relevant correspondence is enclosed for completeness (dated October 2011 and July 2012).

### **Summary**

There is concern that the Pre Submission Draft Plan does not meet the tests of soundness set out at paragraph 182 of the National Planning Policy Framework (NPPF) (March 2012). It will not result in a sustainable pattern of development, contrary to the requirements of paragraph 151 of the NPPF and Section 39(2) of the Planning and Compulsory Purchase Act 2004. Therefore, it is not legally compliant.

This is compounded by its failure to adequately respond to the findings of its own evidence base and representations received during the course of its preparation. On this basis the plan has not been positively prepared.

For these reasons, further work ought to be undertaken by the Council to substantiate its approach to overall housing and economic growth, the apportionment of development to the principal settlements including Stone, and in the case of Stone, the ability of a single urban extension to the north of the town to satisfactorily address the objectively assessed housing needs of the area and delivery of growth in the short, medium and longer term.

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and Dublin**

The following sections of this letter reaffirm the objections of SHL to the emerging plan in its current form, and set out why SHL do not consider that it meets the tests of soundness outlined in the NPPF.

## **Justification**

### Spatial Vision

The Spatial Vision for the Borough is to retain and enhance its high quality unique character whilst providing new homes and employment development, supported by infrastructure provision. Specifically for the market town of Stone, the Vision is for *'a vibrant local economy and an increased mix of high quality residential developments supporting first class business development'*.

There are a number of objectives identified to help ensure the Vision is achieved and in the case of Stone, Objective 13 states:

*'Provide new high quality homes in mix and tenure across a range of sites that mitigate against any adverse impacts and support the sustainable community' (our emphasis).*

The development strategy that follows on in the draft plan seeks to deliver the vision and objectives.

Generally, SHL supports the vision and objectives outlined, however, there is a clear conflict between these and the proposed housing strategy, details of which are set out below.

### Spatial Principle 1 (SP1) – Presumption in Favour of Sustainable Development

SHL supports the inclusion of Policy SP1 as this fully aligns with the guidance contained within the NPPF.

### Spatial Principle 2 (SP2) – Housing and Employment Requirements

SHL strongly objects to SP2 on the basis that the Council should be planning for at least 11,000 new homes during the plan period, consistent with the figures promoted through the West Midlands Phase II Revision, the award of Growth Point Status to Stafford Town and the Council's own evidence base which identifies that a far greater scale of housing is required to address population change and high levels of in-migration from surrounding areas.

We note that whilst the figures contained within the West Midlands Phase II Revision never proceeded to formal adoption, in Stafford's case, the housing target is to be taken as the most up to date housing requirement for the Borough. This was established through the recent Castleworks appeal decision (Appeal Ref: APP/Y3425/A/12/2172968) (dated December 2012) where the Inspector stated:

*'I acknowledge and have sympathy with the Council's*



*position that the phase II RSS was not examined until 2009 and will never be adopted by the Government. It is therefore not part of the development plan. Nevertheless, its contents are based on Government housing projections and are the best examined figures that they have for housing' (paragraph 30).*

To this end, it is unclear why the Council's housing requirement remains at 10,000 dwellings only for the plan period.

The Council's Strategic Housing Market Assessment (SHMA) (September 2012) provides an overview of the current housing market across the Borough and states with reference to the CLG 2008- based household projections, the number of households in Stafford is expected to increase by at least 11,000 by 2033 (a 22.6% uplift on existing). By contrast, there has only been an average of 275 new dwellings built in the last three years (paragraph 5.14). As confirmed in the aforementioned appeal decision, Stafford Borough is an authority of persistent undersupply of housing.

In addition, there is currently an annual net shortfall of 210 affordable dwellings (a gross requirement of 229), in addition to the market need identified above.

Therefore, not only is the future housing requirement (of 10,000 dwellings) inadequate to address market and affordable housing delivery, there is a need to factor in the shortfall in past completions and delivery, in particular, since 2006 (the start of the RSS plan period). It is this lack of delivery (a shortfall of 789 dwellings between 2006/07 and 2010/11) that has driven up the demand and further justification why the 10,000 dwelling figure is insufficient for future planning.

Previous representations submitted on behalf of SHL and others have identified the need for the plan to be providing for a greater level of housing growth but these comments have not been taken on board by the Council. To this end and based on this policy, the plan has neither been positively prepared or justified in this regard and fails to satisfy the tests of soundness at paragraph 182 of the NPPF.

In addition, the Council's decision to proceed with a housing target which is below that which many objectors believe is required, without any justification, is contrary to Regulation 18 of the Town and Country (Local Planning) (England) Regulations 2012 which requires local authorities to take into account any representation made to them in response to invitations under paragraph (1) of Regulation 18.

#### Spatial Principle 4 (SP4) – Housing Growth Distribution

Despite being identified as the second principle town in the Borough after Stafford (draft SP3), Stone is only afforded 8% of new housing in the emerging plan. In contrast, the smaller settlements and rural hinterland receive 20%.

SHL strongly objects to SP4 on the basis that it fails to recognise the role of Stone as a market town and as a key rural service centre in the north of the Borough. It is not clear on what basis the Council considers this approach to spatial apportionment is appropriate, however, paragraphs 6.44 and 6.45 suggest that it is based on existing populations and the pattern of development over the past 10 years.

The Council's evidence base suggests that there is a net requirement for at least 21 affordable dwellings per annum in Stone (420 in total over the plan period), in addition to the open market requirement in order to provide a better range of family homes allowing people to live in and around the town, and securing the future vitality and viability of the centre and services it provides.

The total planned requirement for Stone is currently 469 dwellings (table at paragraph 6.54) which sits well below the requirement identified in the evidence base in both market and affordable housing terms.

Conversely, delivery of the Council's housing strategy is heavily reliant on a large proportion of development coming forward in the key service villages and rural area. Whilst there is evidence of housing need and past completion rates have been high in these areas, the spatial distribution of housing should be based on the relative sustainability and capacity of settlements to take growth. In this regard, the sustainability of Stone is being completely overlooked in favour of a greater proportion of development in smaller less sustainable locations. This is contrary to the NPPF which seeks to focus development into the most sustainable locations. Draft SP3 of the Local Plan identifies Stone as the second principal town in this regard.

The distribution of 20% of the overall housing target into the rural area does not align with the Spatial Vision for the Borough and sits contrary to the evidence base supporting the plan which demonstrates that Stone is a suitable and sustainable location which should be a priority for new growth.

On this basis, SHL cannot support the strategy in its current form and considers that the approach to apportionment of development in Stone is not justified, contrary to the soundness tests of the NPPF.

#### Policy Stone 1 – Stone Town

In general, SHL supports Policy Stone 1 in so far as it seeks to increase the range and type of housing available, across a range of sites in addition to development at the proposed Strategic Development Location to the west of the town. Policy Stone 1 recognises the importance of the role of Stone as a Market Town and source of employment and as a focus for growth and development.

However, SHL strongly objects to the suggestion at paragraph 8.2 that land west of the town (identified as a Strategic Development Location in Policy Stone 2) is the most deliverable for housing development, in contrast to other development opportunities around the town.

### Policy Stone 2 – West and South of Stone

This proposed strategic development location is identified to deliver approximately 500 new dwellings (to the west) and at least 18 Ha of new employment (to the south of Stone Business Park).

Whilst SHL is not opposed to the principle of development in the proposed location, SHL does strongly object to this being the only location for new housing in Stone during the plan period.

Not only is the identification of one strategic site insufficient to meet the quantitative and qualitative housing needs of the town (as set out above with reference to the SHMA), this site is not planned to deliver development until beyond 2021 (eight years from now). It is then projected to deliver an average of 50 dwellings per annum over a 10 year period.

The draft local plan does not address how short to medium term housing needs will be addressed (i.e. between now and 2021) and it is completely contrary to the guidance of the NPPF (and draft policy SP1) to suggest that there will be a restriction on new housing development on any other sites around the town during this period. Furthermore, on the basis that the Core Strategy is unlikely to be adopted until late 2013 (at best) and preparation of a Site Allocations DPD is yet to commence, the Council cannot rely on other site allocations being brought forward in the interim. Even if the plan process were to be accelerated, it is unlikely that it will lead to the delivery of sites for at least another 12-24 months, leaving a backlog of under supply.

To this end, the emerging policies for Stone not only need to make provision for a greater level of development to come forward and spread across the full plan period, but also recognise and enable smaller sites which comply with the principles of the NPPF, to come forward earlier in the plan and enable short to medium term housing supply to be met.

With specific regard to the proposed strategic extension, there is currently a lack of available evidence to suggest that it can deliver the proposed quantum of development (i.e. circa 500 dwellings viably), and even if through comprehensive masterplanning a suitable scheme can be implemented, there is no guarantee that it will be able to support the delivery of 50 dwellings per annum (whether by one housebuilder or more) given that development will be in a single location.

Based on market absorption rates, in order for the Council to deliver 50 dwellings per annum in Stone, more than one site will need to be brought forward in this location at any time. As between April 2009 and October 2012 only 62 dwellings were completed in Stone. This further reinforces the need for the emerging policies to enable smaller sites to be delivered, across different market areas and throughout the plan period, in order to address the annual shortfall of affordable and market homes identified to exist now (in the SHMA).

In this regard, the SHL sites would make a valuable contribution to the housing

market (both in terms of market and affordable homes), the delivery of which will not undermine delivery of the proposed strategic site in the longer term.

We reiterate the view that it would be inappropriate to delay the development of new housing in Stone, particularly in light of the Council's own evidence of housing need (market and affordable) in this principal town and also if the Vision for Stone (outlined at Objective 13) is to be achieved.

### **Conclusions**

As currently drafted, the housing strategy will not deliver sustainable development contrary to the requirements of the NPPF and Section 39(2) of the Planning and Compulsory Purchase Act 2004.

It does not meet the tests of soundness as it has not been positively prepared. In this regard, it fails to recognise the findings of its own evidence which suggests that a much greater level of housing growth is required.

The strategy set out will not be effective in delivering the required level of growth, in particular in Stone, as it underplays its role as the second principal town and its relative suitability, sustainability and appropriateness for new development. Furthermore, allocations in Stone at one site will not be sufficient to achieve the supply required.

The plan should not be allowed to proceed without further work being undertaken to address the fundamental flaws in the strategy in this regard.

We trust that these comments will be taken into account and look forward to receiving further updates in terms of how the Council intends to proceed with the draft plan.

Yours faithfully



Sarah Wozencroft

Enc: Consultation Response Form  
Site Location Plan  
Copy of previous consultation responses dated October 2011 and July 2012

cc: Seddon Homes Limited



**Stafford**  
BOROUGH COUNCIL

**The Plan for Stafford Borough  
Pre-Submission Consultation**

**Representations Form**

Ref:

(For official  
use only)

**Please return completed forms to:**

- Head of Planning & Regeneration, Stafford Borough Council, Civic Centre, Riverside, Stafford, ST16 3AQ
- or by email to [forwardplanning@staffordbc.gov.uk](mailto:forwardplanning@staffordbc.gov.uk)
- or by fax to: 01785 619473

**Responses must be received by 12 noon on Thursday 28<sup>th</sup> February 2013**

**This form has two parts:**

**Part A:** Personal Details

**Part B:** Your representations.

- Please complete Part B of this form for each representation you wish to make. You do not need to complete Part A more than once, but please ensure you state your name or organisation as applicable at the top of each Part B form you submit.
- Please refer to the attached guidance notes on making representations so that they address issues of legal compliance and / or soundness.
- Please note that when representations are submitted only Part B of the form will be published. Contact details on Part A will not be published.

# Part A

## 1. Personal Details\*

## 2. Agent's Details (if applicable)

\*If an agent is appointed please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

Title	<input type="text"/>	MRS
First Name	<input type="text"/>	SARAH
Last Name	<input type="text"/>	WOZENCROFT
Job Title (if applicable)	<input type="text"/>	ASSOCIATE
Organisation (if applicable)	<input type="text"/>	INDIGO PLANNING LIMITED
Address Line 1	<input type="text"/>	LOWRY HOUSE
Address Line 2	<input type="text"/>	17 MARBLE STREET
Address Line 3	<input type="text"/>	MANCHESTER
Address Line 4	<input type="text"/>	
Postcode	<input type="text"/>	M2 3AW
Telephone Number	<input type="text"/>	0161 836 6910
E-mail address	<input type="text"/>	SARAH.WOZENCROFT@INDIGOPLANNING.COM



**7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough legally compliant or sound, having regard to the test you have identified at question 5. You will need to say why this change will make the document legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

PLEASE SEE ACCOMPANYING LETTER

(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**

N/A

(attach separate sheets as necessary)

*Please note the Planning Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the Examination in Public*

**Please ensure you have printed your name or organisation at the top of this form**



## Representation Form Guidance Notes



Representations made within the consultation period will be considered alongside The Plan for Stafford Borough: Submission as part of an examination by an independent planning inspector. The purpose of the examination is to establish whether the plan has been prepared in accordance with **legal requirements**, and whether it is **sound**.

### **Representations should therefore focus on legal compliance and soundness.**

If you wish to make a comment seeking to change The Plan for Stafford Borough you should make clear in what way you consider it is not legally compliant or sound. You should try to support your comment by providing evidence and supporting information showing why it should be changed. It will be helpful if you also say precisely how you think it should be changed.

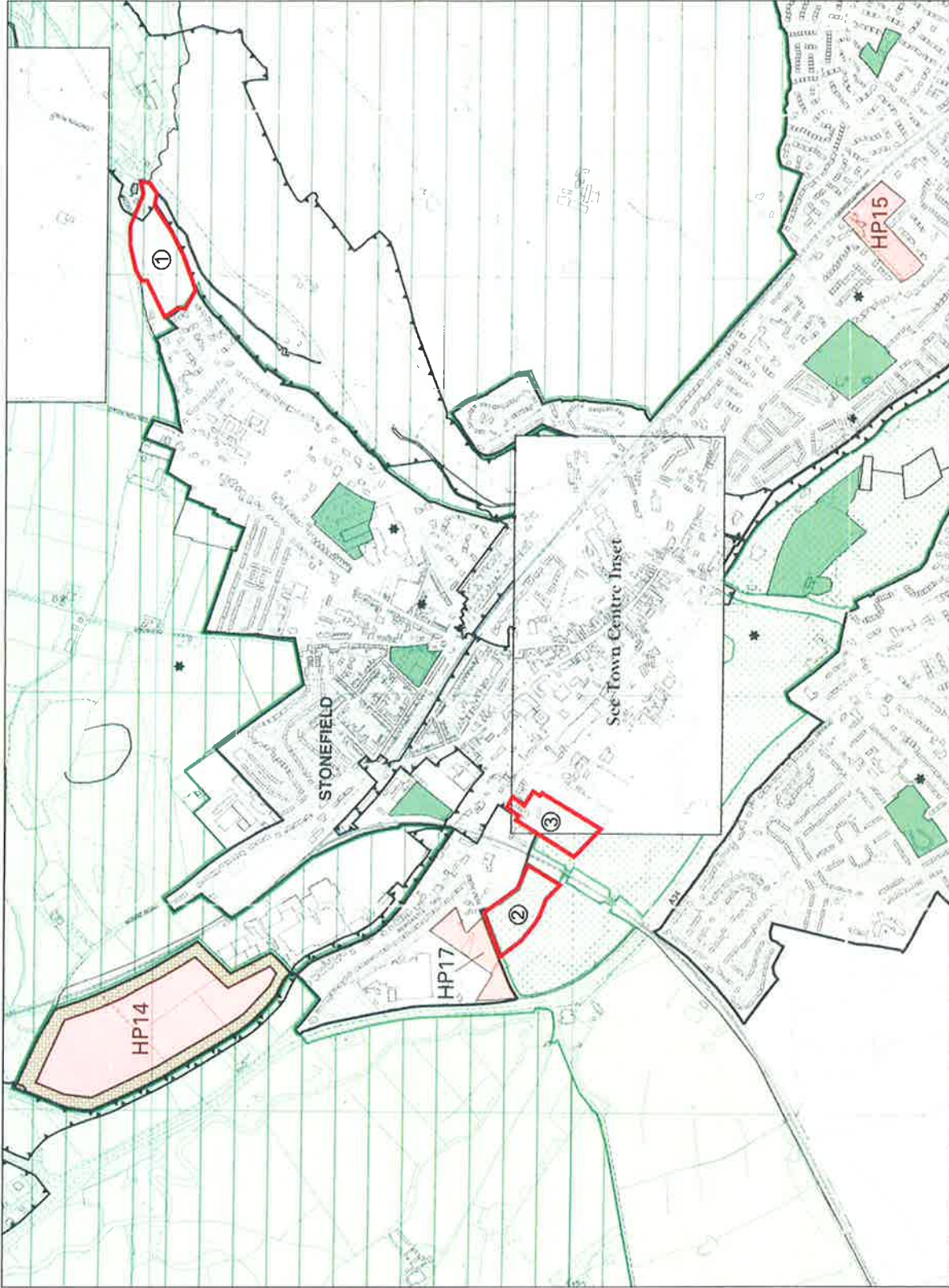
For the plan to be **legally compliant** it must:

- be prepared in accordance with:
  - the Council's Local Development Scheme (a timetable for plan preparation);
  - the Council's Statement of Community Involvement (which includes the Council's policy for community engagement on The Plan for Stafford Borough) and
  - relevant Acts and Regulations; in particular the Town and County Planning (Local Planning) (England) Regulations 2012;
- have been subject to sustainability appraisal;
- have regard to:
  - national policies, advice and guidance issued by the Secretary of State; and
  - the Stafford Borough Sustainable Community Strategy and Stafford Borough Community Action Plan;
- be in general conformity with the Regional Spatial Strategy for the West Midlands;
- meet legal requirements under the Duty to Co-operate (introduced via the Localism Act 2011).

**Soundness** is explained in the National Planning Policy Framework. For a plan to be sound it must be:

- **Positively prepared** - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements;
- **Justified** – the plan should be the most appropriate strategy based on a robust and credible evidence base;
- **Effective** – the plan should be deliverable over its period;
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

Where there are groups who share a common view on how they wish to see The Plan for Stafford Borough changed, it would be very helpful for that group to send a single comment rather than for a large number of individuals to send in separate comments which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.



Extract from Stafford Borough Local Plan 2001

- KEY
1. Nicholls Lane
  2. Trent Road
  3. Newcastle Road

Project Plan for Stafford Borough Representations

Title Site Location

Client Seddon Homes Limited

LPA Stafford Borough Council

Date: October 2011  
 Project No: 0403036  
 Drawing No: 0403036/001  
 Drawn by: KN  
 Scale: NTS - A3

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**By email and post**  
 forwardplanning@staffordbc.gov.uk

9 July 2012

let.006.JP.04030036

Indigo Planning Limited

Dear Sirs

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**THE PLAN FOR STAFFORD BOROUGH: STRATEGIC POLICY CHOICES**

We write further to publication of the above document to provide representation on behalf of our client, Seddon Homes Limited.

Our comments follow on from those submitting in October 2011 and therefore should be read alongside our latest response (copy enclosed).

This letter sets out our key comments and objections in light of the publication of the National Planning Policy Framework (NPPF) which forms a material consideration and in accordance with which emerging Local Plans must be prepared (NPPF paragraph 182).

**The Scale of Housing: Borough-wide Development Strategy**

Questions 1 & 2

As set out in our previous letter, we believe that the Council should be planning for at least 11,000 new homes during the plan period, consistent with the figures promoted through the West Midlands RSS Phase II Revision, the award of Growth Point Status to Stafford Town and Council's own evidence base which identifies housing need. On this basis we object to the preferred approach taken within chapter three of the document to set an annual housing provision of 500 dwellings.

Not only has the Council set a restrictive target, the current proposals limit the housing target further by factoring in 'committed' sites, which total some 3,000 units, thereby leaving the Council with a significantly lower target of 7,000 over the plan period. We object to the approach taken which is contrary to the positive approach to plan preparation required by the NPPF.

Paragraph 17 states that:

*"Every effort should be made objectively to identify and then meet the housing... needs of an area, and respond*

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Paul Womersley  
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Elr Danson  
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Matthew Mansfield  
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Guan W. Guo  
 EA House MR1, MRT11

Tin Wong  
 EA House MRT18

Kevin Greenough  
 EA House Eglf/Dg/JG MRT18

David Chan  
 EA House MR1, MR11

Mick Womersley  
 EA HOUSE MR1, MR15

John Spain  
 EA HOUSE MR1, MR15

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need, elsewhere this approach will only serve to encourage growth in isolated areas leading to increased travel by private car and would be contrary to the Council's sustainable development objectives and those of the NPPF.

Given this, apportionment to Stone should be between 10% - 15% equating to circa 700 and 1,000 dwellings over the plan period (based on a requirement of 11,000 dwellings as set out earlier).

Not only would this level of housing in Stone address local housing needs, including delivery of affordable housing, it would enable a number of smaller sites to come forward to meet short to medium term housing needs, with the proposed strategic extension targeted for delivery later in the plan.

#### **Phasing of Delivery and Strategic Site at Stone**

Although not covered within the Strategic Policy Choices document, we take this opportunity to comment on the Council's stated preference for a single strategic site at Stone, located to the west of the existing settlement (SHLAA site 31), and the Council's intentions to delay the delivery of housing on this site to later phases of the Plan as suggested in Core Policy 2 of the Draft Publication Local Plan (October 2011).

Firstly, we consider that it is not sustainable, justified or consistent with national policy to identify only one strategic site for new housing in Stone. The proposed strategic site is and is separated from the town's main amenities and services by Westbridge Park and the River Trent, giving rise to questions about the site's merits in terms of sustainability. The NPPF states that plans should have regard to market signals and ensure choice and competition in the market (NPPF paragraph 47), but the Council's approach to locate all new housing on one site does not allow flexibility for other sites to come forward for development.

Allocating a single site in this way does not have regard to the current housing market conditions and slow rate of delivery seen over recent years that can be expected to continue well into the plan period. This does not assist in meeting the identified need for additional housing in the town and therefore a more suitable approach would be to allocate a variety of smaller sites to offer choice and encourage growth in the market. Based on the suggested increased apportionment to Stone, this does not preclude development of the planned strategic extension in Stone but would address local housing need in earlier years of the plan.

Seddon Homes Limited has an ownership interest in three sites at Stone, all of which were identified in the SHLAA as being either deliverable or developable. SHLAA sites 64, 309 and 326 are still available and are identified as developable alongside the identified strategic site. They are also closer to the town's amenities and services and therefore represent suitable housing sites.

We reiterate our view that it would be inappropriate to delay the development of new housing in Stone. Indeed, this would be contrary to the clear national

direction in NPPF to plan positively for new growth and meet local need. This position is further reinforced by reference to the Inspector's Report for Central Lancashire which made clear the imperative for maintaining a level of flexibility to ensure growth, and commended the Council's approach to allow for over-provision during the first part of the Plan period to ensure the supply of housing is maintained (paragraph 51 of Inspector's Report). In light of this, and as we stated in our previous representation, it would be better to bring greater flexibility to site allocations, allowing a greater number of sites to come forward in a phased manner in earlier stages in the Plan.

The Strategic Policy Choices document identifies that 17% of commitments have been located in Stone, however there is no breakdown in either this document, or the Annual Monitoring Reports, as to the level of actual completions.

As mentioned above, Seddon's sites at Stone were all identified in the SHLAA as being either deliverable or developable. Indeed, their first phase of development at Newcastle Road (application reference: 10/14329/FUL) is already nearing completion demonstrating Seddon's excellent track record for delivery.

In light of the national direction in NPPF to encourage the delivery of new housing it is considered that the sites at Nicholls Lane and Trent Road would be suitable sites to meet the Borough's short to medium term need for new housing in Stone.

### **Affordable Housing**

Paragraph 6.10 confirms the Council's approach to seeking a provision of 30% of the total number of dwellings on sites for affordable housing. We support the acknowledgment that there is scope for the level of provision to be varied on a site by site basis subject to viability testing.

### **Means of Directing Growth**

We support the principle of the Plan identifying new residential development boundaries relating to the spatial distribution of growth proposed through the plan, subject to seeing further details as the DPD progresses to examination.

### **Conclusions**

The NPPF is clear that Local Plans need to show that they are positively prepared, justified, effective and consistent with national policy in order to be found sound at examination (paragraph 182).

In its current form the emerging Local Plan does not plan positively; it sets a conservative housing target, shows lack of flexibility by identifying a single strategic housing site in Stone and phases development back to later stages of the Plan as suggested in Core Policy 2 of the Draft Publication Local Plan.

We contend that the Council should not only be planning for a minimum of 11,000 new dwellings across the Borough; 10-15% should be apportioned to Stone and in this context, additional sites beyond the current proposed extension in Stone should be identified for development.

We trust that our comments will be taken into account and look forward to receiving written confirmation of receipt and information regarding future consultations.

Yours faithfully

A handwritten signature in cursive script, appearing to read 'Jen Popplewell', written in dark ink.

Jen Popplewell

Enc: Letter dated 19 October 2011  
cc: Seddon Homes Limited



Forward Planning  
 Stafford Borough Council  
 Civic Centre  
 Riverside  
 Stafford  
 ST16 3AQ

**By email and post**  
 forwardplanning@staffordbc.gov.uk

19 October 2011

let.002.CB.KW.04030036

Dear Sir/Madam

**THE PLAN FOR STAFFORD BOROUGH, DRAFT PUBLICATION:  
 CONSULTATION RESPONSE**

We write further to the publication of the above document to submit representation on behalf of our client, Seddon Homes Limited.

Seddon Homes Limited has an ownership interest in three sites around the town of Stone. These sites are located at Nicholls Lane (north east), Trent Road (west), and Newcastle Road (west) respectively; the location and extent of each can be seen on the enclosed plan. Each of these sites has been identified in the Council's 2011 SHLAA Review as being either a deliverable or developable site for residential purposes (references 64, 309 & 326, and 131a & 285 respectively) and as such each should be given due consideration in helping to meet the future housing need for the town.

The Council's housing requirement for Stafford Borough has been set out in Appendix A of the Draft Plan. This requirement is stated as being 10,000 additional dwellings between 2011 and 2031, i.e. 500 additional dwellings per annum. The Draft Plan acknowledges the contribution that sites identified in the SHLAA (2011 Review) as 'potential developments', i.e. those within the residential development boundary but not currently in the planning process, will make to overall housing development, discounting this figure by 25% to allow for sufficient development land provision. For Stone, the SHLAA indicates that there is a potential yield of 242 new dwellings from such sites, being discounted to approximately 180. The Draft Plan identifies a requirement for an additional 500 (approx.) dwellings required within Stone up to 2031, with Core Policy 2 stating that '*development in Stone may be phased later in the Plan period where the cumulative completion rates for the Borough exceed 500 new homes per year*', Core Policy 7 referring to and Core Policy 8 identifying a Strategic Development Location to the west of Stone which could accommodate the balance of new development for the town.

Objection

On behalf of Seddon Homes Limited, we wish to object to the above, principally, to the overall figure for new development of 10,000 additional new dwellings to 2031; the requirement for only 500 additional dwellings within Stone (over and

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Matthew Mansfield  
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John Atkinson  
 EA House M17E 1

Tim Waring  
 EA House M17E 1

Frank Crabbings  
 EA House D17E 1

Doug Hill  
 EA House M17E 1

Mick Kennedy  
 EA House M17E 1

John Spall  
 EA House M17E 1

Also in London, Leeds  
 and Dublin

above those identified by 'potential development sites'); the potential for additional development in Stone to be phased to later in the Plan timeframe; and the principle of identifying only a single strategic site in proximity to Stone to accommodate the additional housing requirements.

#### Justification

##### *Housing Need*

The draft RSS for the West Midlands was progressed through to the Panel Report stage in 2009, at which point it was acknowledged that the policy was 'sound' and therefore confirmed the need across the Stafford Borough for an additional 11,000 homes between 2006 and 2026, equating to an annual average of 550 dwellings. Although the recommendations of the Panel were never progressed through to the 'Proposed Changes' stage (with work halted when the regional assembly was dissolved and the coalition government signalled its intention to abolish regional strategies completely) the position on housing requirements has not reduced. If anything, due to changes in the economic climate and the reduction in housing completions over that period, the need for additional housing will be greater to the Plan date of 2031.

Since 2006, the Council's housing monitoring reports indicate that a total of 2403 dwellings have been built, equating to 400 per annum (HMR 2011). This is clearly well below the anticipated 550 per annum identified within the RSS.

This suggests that not only should the annual target of 550 be adopted in the emerging Plan, but an allowance should be factored in for the shortfall of development already experienced between 2006 and 2011, i.e. 897 dwellings or an additional 45 dwellings per annum for the period 2011 - 2031 (as the RSS figures related to the period of 2006 – 2026).

In addition to the concerns relating to the headline number of new dwellings required, we are concerned with the apportionment of these across Stafford town, Stone and the rural areas. The Draft Plan directs only 7% of new development towards Stone. Having regard to the current distribution of population across the Borough, other economic development objectives for the town of Stone, and the identified need to rebalance the demographic make up of the town, it would be more appropriate to increase the level of housing being directed towards Stone. A simple revision of the apportionment, in line with the distribution considered as part of the RSS consultation, would be to increase the proportion of new development for Stone, potentially to 15%, which would increase the overall housing requirement for the town to approximately 1,650. When factoring in existing commitments (HMR 2011), and making an allowance for SHLAA 'potential developments', this would result in the need for an additional 1,160 dwellings for Stone. Even reducing the apportionment to allow for 10% of new development to be directed to Stone there would still be a net requirement of 610 new homes.

We therefore request that the Council revisit their new housing requirements to increase the overall requirement, and reassess the apportionment across the



Borough to better reflect the needs of the respective towns and rural areas (and to reflect the contribution new housing development can make in helping to support/realise economic development objectives).

#### *Timing of Development*

It would be both impractical and inappropriate to delay the development of residential development in Stone in the manner suggested by Core Policy 2. It is difficult for the planning process to control the correlation between granting planning permission and that permission being implemented. If this approach were to be adopted then it could potentially undermine any developer confidence in pursuing residential proposals for new development in the town and could hinder development to the detriment of the local economy.

It would be more appropriate to allow for a number of strategic sites to be identified and to release these in a phased manner rather than identifying one strategic site and applying a potential threat to release of the site in the manner currently suggested.

#### *Strategic Site Identification*

It is not sustainable, nor is it consistent with the provisions of PPS1 or PPS3, for the Council to identify only one strategic site for residential development at Stone. Although the housing need targets have made an allowance for development being undertaken on those sites identified as 'potential developments' from the SHLAA, this approach is also questionable as the sites should not be taken into account as providing for definitive development unless they benefit from extant planning permission.

The single identified strategic site lies outside the residential development boundary and as such all other sites with potential to provide 10+ residential dwellings (as identified in the SHLAA) should be given equal consideration in meeting the identified need, or as suggested, the increased, new development targets.

As set out in the SHLAA, part of the consideration of sites in terms of whether they will be deliverable or developable is whether they are a suitable location to contribute to the creation of sustainable communities. The identification of one single strategic site would not contribute to the creation of a sustainable community. It would be more sustainable to build on the existing communities by providing for the ability to develop and number of smaller, peripheral sites which lie adjacent to, and can therefore be integrated with, existing residential areas and the town centre.

Allocating a single site for housing growth in this way fails to take account of the constrained housing market that exists currently and can be expected to persist during much of the plan period. Rates of sales on individual residential developments are running at half their long term average and this imposes an upper limit on the number of units that a single site can deliver in one year. Only through providing a number of different sites can the mix of sizes

and designs be created such that a sufficient number of new homes can be funded and built within Stone. A variety of sites offers home buyers choice and enables developments in Stone to appeal to a wider demographic as well as allowing for preferences in terms of location. The “all or nothing” approach delivered by allocation of a single site presents unnecessary risk to housing delivery and is unjustified in the situation that exists where other sites are available and developable.

Paragraph 8.45 of the draft Plan confirms that there is insufficient land within the urban boundary to provide significant new housing in Stone (a required need identified by the LDF background papers) and, as such, acknowledges the requirement for development on Greenfield sites at the edge of the town. Neither this paragraph, nor the background papers informing the LDF process suggest that the requirement for additional residential development within the town should be restricted to the west of the existing urban area, or within a single site. There is no demographic or physical justification for this approach and as such it is flawed and unjustifiable.

#### Suggested Changes

The Council’s SHLAA Review 2011 makes it clear that the three sites owned by Seddon Homes Limited (as referred to above), located in and around the periphery of the town, are suitable, available, and achievable for housing development. They are all well located in terms of proximity to the existing urban area, infrastructure and services, and could contribute towards meeting the housing need in a more organic manner, better reflecting the natural evolution of the town.

In order to achieve sustainable communities, with a range of housing types available to all across the town of Stone, the Plan should acknowledge the potential for a number of strategic housing sites across the town and this should include the potential to include the above three sites.

We would be grateful to receive acknowledgement of this representation.

Yours faithfully



Clare Bland

Enc: Site location plan  
Consultation Response Form

cc: Seddon Homes Limited

If you require additional space for your response, please photocopy this form.

**Please provide your name and address below. If you are an agent acting on behalf of a client, please specify**

SARAH WILLIAMS  
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**E-mail address**

SARAH.WILLIAMS@INDIGOPLANNING.COM

Thank you for taking the time to provide your comments. All comments will be taken into account when preparing the *Plan for Stafford Borough - Publication* document. Please return this form to the following address, ensuring receipt by **12 noon on Friday 21st October 2011** :

Forward Planning  
Civic Centre  
Riverside  
Stafford  
ST16 3AQ

or e-mail your comments to [forwardplanning@staffordbc.gov.uk](mailto:forwardplanning@staffordbc.gov.uk)

You can also make comments via our online consultation system at <http://staffordbc-consult.limehouse.co.uk/portal/>

Please note that your contact details will be added to our LDF Database, and you will be contacted, unless otherwise requested, regarding LDF progress and future consultations.

**Please specify your contact preference (please tick one answer)**

*(please tick one answer)*

- E-mail .....
- Post .....
- No preference .....

## Draft Publication Response Form

**Please specify the question or paragraph number your comments relate to**

**Please provide your comments below**

SEE COVERING LETTER

**Please specify the question or paragraph number your comments relate to**

**Please provide your comments below**

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr Roly Tonge
Comment ID	PS341
Response Date	28/02/13 10:21
Consultation Point	6.15 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Effective

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Not only are employment land development rates erratic, it is often the case that large amounts are developed in one location in a short period of time due largely to the amount of large scale B8 space built over recent years. This is also a Borough wide figure and a number of potential needs and types of business have to be catered for. We are therefore of the view that a much larger supply needs to be identified which allows for a phased release during the Plan period. In this way there should be a ready supply to meet most needs in most locations over the Plan period without swamping the market with allocations that may not be implemented.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd ( )
Comment ID	PS342
Response Date	28/02/13 10:24
Consultation Point	8.1 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Positively prepared  
. Justified

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Paragraph 8.1 consistent with the overall strategy and in recognition of the 'second town' status of Stone in Stafford Borough and the spatial role it serves in providing services and facilities for a wide rural hinterland states "a significant level of development will be concentrated in the town". It is not considered that this objective is carried through in the development allocation made in Stone which is in fact very modest when set against evidence of housing need and the recent success of encouraging the development of local employment. Stone is a vital and vibrant market town and it is not considered a single development allocation for housing reserved for after 2021 is an adequate planning response to housing need. Given some of the difficulties in delivering adequate infrastructure in Stafford town it would seem highly appropriate to plan for a higher proportion of the Boroughs housing apportionment to be allocated to Stone.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd ( )
Comment ID	PS343
Response Date	28/02/13 10:25
Consultation Point	12 POLICY STONE 1 ? STONE TOWN ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Effective

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Consistent with the overall strategy and the Spatial Principles 1, 2 and 3 and in recognition of the 'second town' status of Stone in Stafford Borough it is considered that the housing development apportionment to Stone is very modest.

Stone is a vital and vibrant market town and it is not considered a single development allocation for housing reserved for after 2021 is an adequate planning response to housing need. Given some of the difficulties in delivering adequate infrastructure in Stafford town it would seem highly appropriate to plan for a higher proportion of the Boroughs housing apportionment to be allocated to Stone.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd ( )
Comment ID	PS344
Response Date	28/02/13 10:31
Consultation Point	8.2 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Justified

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Paragraph 6.24 of this Submission Plan in the context of the Colin Buchanan Infrastructure Delivery Plan report, July 2012 recognises the relatively unconstrained background to the physical infrastructure required to support further development in Stone. The issue of transport infrastructure is not covered in detail and it should be recognised that the transport network, both road and rail, in Stone is well serviced and relatively uncongested. Stone does not suffer with the same restrictive highway capacities as does Stafford and provided housing, employment and retail and town centre facilities are planned and implemented together there is a good opportunity to improve the conditions for self-containment. It is considered that the implications of HS2 as it might impact on development possibilities in Stone are difficult to quantify although the alignment to the west is clearly an absolute constraint in that corridor. The implications of HS2 (Phases 1 and 2) as it might impact on services on the WCML is also difficult to assess although it is suggested that Stone could benefit from improved rail services.

With more specific reference to the south-east of Stone and with reference to site SN-2 it is noted that the Colin Buchanan Infrastructure Delivery Plan report, July 2012 comments that development could be delivered in the long-term without the need for a new railway crossing, subject to further detailed investigation of possible local highway infrastructure improvements. There are a number of potential improvements that could be made to the B5027 to improve traffic flow and address road safety should an allocation in this area be identified

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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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr gillan paris paris
Comment ID	PS345
Response Date	28/02/13 10:35
Consultation Point	11 POLICY STAFFORD 4 ? EAST OF STAFFORD ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Justified  
. Effective

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Re: 11 POLICY FOR STAFFORD 4 LAND EAST OF STAFFORD

The Stafford Borough Integrated Transport Strategy 2011 - 2026 has been prepared for the Borough by the County Highways Authority and the Report concludes that the majority of proposed housing in the Plan for Stafford Borough should, for strategic reasons, be to the west and north of the town. Any major development to the East of Stafford would: '*require the provision of the Stafford Eastern Bypass which (would be) an expensive and damaging solution, and based upon the evidence of highway modelling increased levels of congestion would result*'. The Eastern Bypass (also known as the Eastern Distributor Road or EDR) will be difficult to construct technically and consultants advise would cost circa 200m to build. There is no prospect of Government funding for this major project, and funding of this magnitude cannot be raised from developers. The concept of the Eastern Bypass has

consequently been dropped by the County Highway Authority and any reference to it in the Plan for Stafford Borough should be deleted also.

In drafting a policy for development to the East of Stafford it is not acceptable for the Borough to continue to show a proposal within the Plan that cannot be implemented within the Plan Period, and which has been discounted as a realistic proposal by the County Highway Authority. To show the Eastern Bypass in this way will also create planning blight affecting all property along the route of the proposed road, and may inhibit and damage positive development proposals that could be implemented with minimal impact on infrastructure to the East of Stafford.

For these reasons the Plan for Stafford Borough should be considered unsound

**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.**

Delete the Eastern Bypass (EDR) from the Plan for Stafford Borough. Borough Planning Policy will then be consistent with Staffordshire County Council Planning Planning Policy, and a more realistic development strategy for the East of Stafford can then be pieced together drawing on multiple smaller sites.

*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?**

No, I do not wish to participate at the examination in public

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Taylor Wimpey/Bellway ( )
Comment ID	PS346
Response Date	28/02/13 10:37
Consultation Point	1 SPATIAL PRINCIPLE 1 (SP1) - PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Justified  
. Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The Plan period runs for 20 years from 2011 to 2031 and sets out to deliver 500 homes a year. The RSS for the West Midlands (WMRSS) Phase 2 Revision sought to deliver higher levels of growth (550 homes a year) from 2006 based on the evidence of housing need at that time. Since 2006, there has been under delivery in the Borough, against that identified need. We recognise that the Council wishes to support growth and to significantly boost the supply of housing land. However, we are concerned that the unmet needs since 2006 do not seem to have been provided for in the plan. We also note that the 2010-population based household projections are due to be published shortly and these may have implications for the level of development to be planned for.

**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.**

Unmet needs since 2006 need to be provided for in the plan. Consideration will need to be given to 2010-population based household projections when published.

*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

**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**

Taylor Wimpey and Bellway have major interests in land to the West of Stafford. The plan has significant implications for their interests and business plans.



## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Taylor Wimpey/Bellway ( )
Comment ID	PS347
Response Date	28/02/13 10:39
Consultation Point	8 POLICY STAFFORD 1 ? STAFFORD TOWN ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Policy 1 sets out to deliver 5,500 new homes at Stafford. That is not consistent with Spatial Principle 4 which states that 72% (7,200) homes will be delivered at Stafford. Based on the assessment in the Table following 6.54, 5,560 homes are required at Stafford.

**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.**

In policy Stafford 1, delete ?5,500? and replace with ?5,560? [or other such figure as is shown to be sound]

*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

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**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**

Taylor Wimpey and Bellway have major interests in land to the West of Stafford. The plan has significant implications for their interests and business plans



C T Planning  
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Staffordshire  
WS13 6LH

01543 418779

28/02/13 10:42

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	St Modwen
Comment ID	PS348
Response Date	28/02/13 10:41
Consultation Point	7.36 Paragraph ( <a href="#">View</a> )
Status	Submitted
Submission Type	Web
Version	0.1

#### Files

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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

These representations are made on behalf of St Modwen who own land north of Milford Road, Walton on the Hill as identified in red on drawing 3013-99A.

Objection is raised to the identification on the Policies Map of the section of the Eastern Distributor Road from South of St Thomas' Bridge, Baswich to Milford Road, Walton on the Hill. The inclusion of this section of the road results in the plan being unsound as the local plan is not positively prepared, effective or consistent with national policy.

The Plan for Stafford makes provision (paragraph 13.23) for "the Eastern Distributor Road including the Beaconside extension from Weston Road to Baswich Lane road bridge at St Thomas' (East) Stafford SDL." Whilst the route is shown on the Policies Map, no provision or indeed policy statement is made for the route south of St Thomas' Bridge, in spite of a plan period extending until 2031.

The NPPF advises that (paragraph 154) Local Plans should be aspirational but realistic and should only include only policies that provide a clear indication of how a decision maker should react to a development proposal.

Local Planning Authorities should (paragraph 156 of the NPPF) set out the strategic priorities for the area in the Local Plan, including strategic policies to deliver inter alia the provision of infrastructure for transport. More crucially, the NPPF advises (paragraph 157) that Local Plans should "plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework" and "be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date." In this context the NPPF advises (paragraph 162) that Local Planning Authorities should work with other Authorities and providers to assess the quality and capacity of infrastructure for transport and its ability to meet forecast demands;

The NPPF states (paragraph 173) that pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking and hence "Plans should be deliverable". Furthermore the NPPF advises (paragraph 177) that it is equally important to ensure that "there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion".

The Plan for Stafford, in order to be sound, has to identify its infrastructure requirements for the plan period, based on a credible and robust evidence base. What is proposed in the Plan must be deliverable over its period.

The evidence base for The Plan for Stafford includes the Stafford Borough Integrated Transport Strategy 2011-2026. Whilst this document recommends a number of highway improvements that have been incorporated in to The Plan for Stafford including "the Eastern Distributor Road including the Beaconside extension from Weston Road to Baswich Lane road bridge at St Thomas' (East) Stafford SDL)", it did not recommend the extension of the Eastern Distributor Road south of St Thomas' Bridge to Milford Road, Walton on the Hill.

There is no policy to deliver the Eastern Distributor Road beyond St Thomas' Bridge in the period up to 2031. There is no evidence base requiring its provision in the plan period. The route of the Eastern Distributor Road south of St Thomas' Bridge to Milford Road, Walton on the Hill has been protected since before the adoption of the Stafford Borough Local Plan in 1998. In 2031, the route will have been protected for 33 years with no realistic or firm policy proposals to secure its provision. On this basis, it is considered unsound to continue to show a route south of St Thomas' Bridge. The route of the Eastern Distributor Road south of St Thomas' Bridge to Milford Road, Walton on the Hill should therefore be deleted from the Policies Map in order that it be considered to be "sound", as required at paragraph 182 of the National Planning Policy Framework.

**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 Plan for Stafford, in order to be sound, has to identify its infrastructure requirements for the plan period, based on a credible and robust evidence base. What is proposed in the Plan must be deliverable over its period.

There is no policy to deliver the Eastern Distributor Road beyond St Thomas' Bridge in the period up to 2031. There is no evidence base requiring its provision in the plan period. The route of the Eastern Distributor Road south of St Thomas' Bridge to Milford Road, Walton on the Hill has been protected since before the adoption of the Stafford Borough Local Plan in 1998. In 2031, the route will have been protected for 33 years with no realistic or firm policy proposals to secure its provision. On this basis, it is considered unsound to continue to show a route south of St Thomas' Bridge. The route of the Eastern Distributor Road south of St Thomas' Bridge to Milford Road, Walton on the Hill should therefore be deleted from the Policies Map in order that it be considered to be 'sound', as required at paragraph 182 of the National Planning Policy Framework.

*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

**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

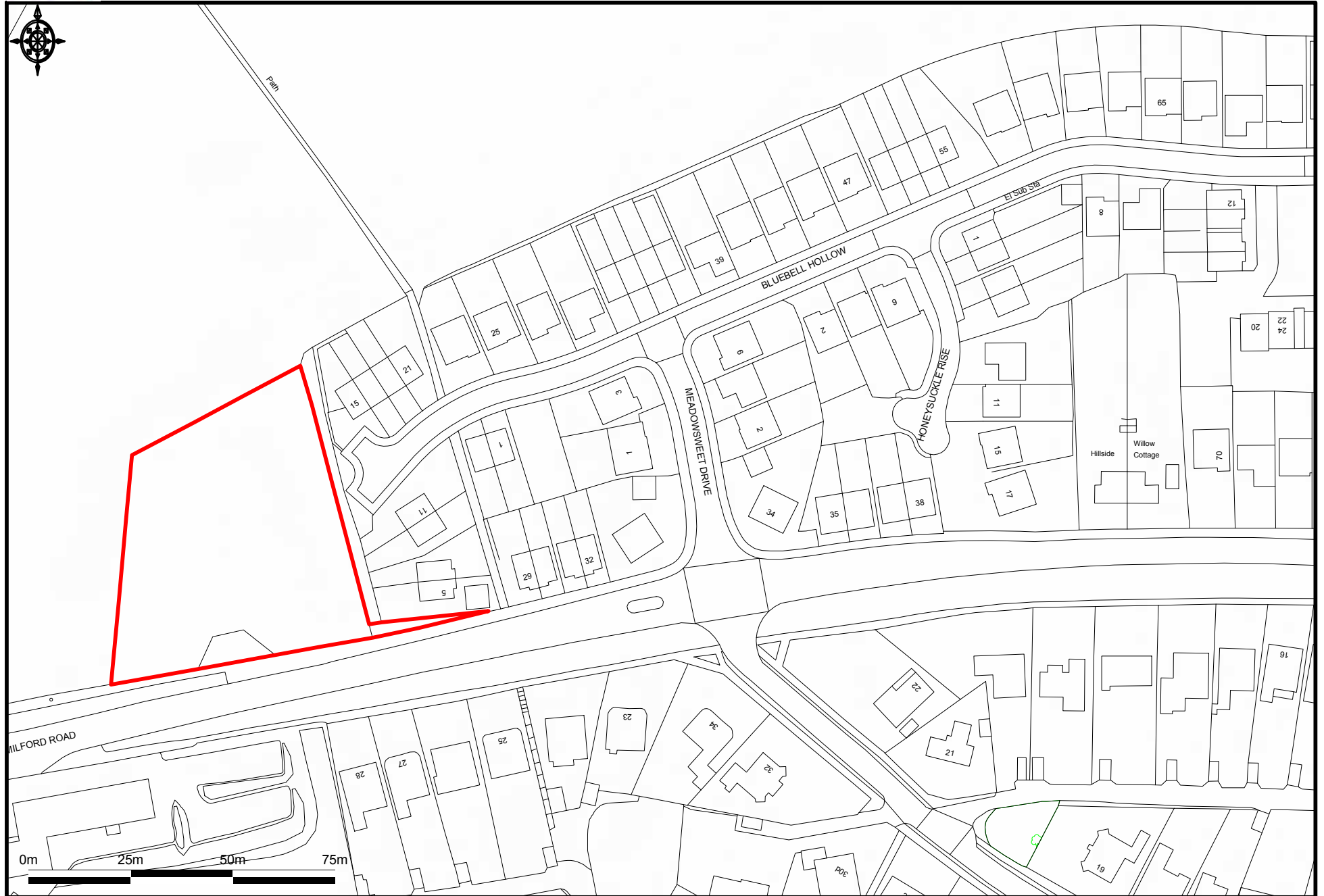
**If you wish to participate at the Examination in Public, please outline why you consider this to be necessary**

In order to appraise the Inspector of how the Plan should be amended to achieve soundness.

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.**

[3013-99A Location Plan 1 1250 at A4 September 2012\\$4755664852360157125}.pdf](#)  
Drawing 3013.99A : Location Plan Scale 1.1250 at A4  
Location plan of site



## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Taylor Wimpey/Bellway ( )
Comment ID	PS349
Response Date	28/02/13 10:42
Consultation Point	8 POLICY STAFFORD 1 ? STAFFORD TOWN ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Para. 2.8 identifies a need to provide for 1,000 returning military personnel by 2014/15. The West Midlands RSS Phase 2 Revision Panel recommended that provision of *?1,000 additional for Defence Personnel related to Stafford on return from Germany separately listed.?* (Recommendation 3.1). We note that Defence Estates response to the Local Choices consultation advises that the position in relation to the West Midlands RSS review remains appropriate. It is unclear how that additional provision has now become 400 in policy Stafford 1 and whether such provision is sufficient to meet the needs. We acknowledge this is additional to the 7,200 homes at Safford, but if insufficient provision is made for returning personnel, that may have unforeseen consequences on the housing market and for affordability.

We also consider that the policy wording is unclear and has the potential for confusion. SP2 states that additional provision is to be made for military personnel over and above the 500 a year/10,000. Stafford 1 says that *?...5,500 new homes, including additional provision...?* We believe that is meaning that the military personnel is over and above the provision for the town, but the wording is not clear. In addition, the confusion is amplified by including within criterion v), reference to *?up to 400 homes?* for service personnel.

**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.**

Justification is required as to how the level of housing for military personnel has been arrived at.

In addition, we recommend:

- numbering the 1 st para. under the title Housing ?1?
- deleting *?including additional provision for Ministry of Defence personnel?* from the end of that paragraph;
- deleting criterion v;
- insert a new paragraph after criterion iv) which reads: *?2 Provide 400 [or the appropriate figure having justified the level of provision] new Service Family Accommodation units to meet the requirements of Ministry of Defence Personnel?*

*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

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**If you wish to participate at the Examination in Public, please outline why you consider this to be necessary**

Taylor Wimpey and Bellway have major interests in land to the West of Stafford. The plan has significant implications for their interests and business plans.



## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Taylor Wimpey/Bellway ( )
Comment ID	PS350
Response Date	28/02/13 10:44
Consultation Point	8 POLICY STAFFORD 1 ? STAFFORD TOWN ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The section on employment sets out 4 circumstances in which employment land may be lost to other uses. It is unclear how the policy relates to allocated sites, such as West Stafford. We suggest that text needs to be added to make it clear that the restriction on the loss of employment does not apply to allocations

**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.**

Under employment, amend the 2 nd proper paragraph to read

*?Except where sites are allocated by this plan for alternative uses, development or conversions...?*

*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

**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**

Taylor Wimpey and Bellway have major interests in land to the West of Stafford. The plan has significant implicatiосn for their intersts and business plans.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Taylor Wimpey/Bellway ( )
Comment ID	PS351
Response Date	28/02/13 10:47
Consultation Point	8 POLICY STAFFORD 1 ? STAFFORD TOWN ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Justified  
. Effective

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The key diagram shows a strategic employment site notation over the West of Stafford. Policy Stafford 1 identifies new strategic employment sites at North and East Stafford, but not at West Stafford. Policy Stafford 3 identifies provision of new small-scale employment areas totalling 5 hectares. This small scale provision is not 'strategic'. West Stafford is well-located in relation to employment, given its proximity to the town centre and the proposed developments of 36,000 square metres of new retail space and 45,000 square metres of new office. This floorspace has the potential, at typical employment densities, to accommodate around 4,000 new jobs.

It is likely that given its location, employment at Stafford West will focus on services for the new community, in the form of employment in schools and local facilities and services such as shops. The District Centre is also likely to provide the opportunity for some small scale B1/A2 provision.

**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.**

Delete strategic employment notation at West Stafford from the key diagram

*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

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**If you wish to participate at the Examination in Public, please outline why you consider this to be necessary**

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## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Taylor Wimpey/Bellway ( )
Comment ID	PS352
Response Date	28/02/13 10:52
Consultation Point	10 POLICY STAFFORD 3 ? WEST OF STAFFORD ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Justified  
. Effective

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Land West of Stafford is well-located close to significant existing employment provision in and close to the town centre. The local plan also provides for significant future employment close to the site through the delivery of 36,000 square metres of new retail space and 45,000 square metres of new office in the town centre. This proposed floorspace has the potential, at typical employment densities (Employment Densities Guide 2 nd Edition, HCA 2010), to accommodate 5,600 jobs.

We consider therefore that land west of Stafford should provide some local employment opportunities, focussed on the new district centre. That is likely to take the form of employment in facilities such as the school, shops, food & drink (A3/4/5), small scale offices (A2/B1), care provision. We consider therefore that criterion iv should be amended to refer to the provision of local employment opportunities at the district centre

**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.**

*Amend iv to read: ?opportunities for local employment should be incorporated into the district centre. This could take the form of a mix of local uses/facilities such as the school, retail (A1), food & drink (A3/4/5), small scale offices (A2/B1), care provision.?*

Add to 7.29

*?Land West of Stafford is well-located close to significant existing employment provision in and close to the town centre. The local plan also provides for significant future employment close to the site through the delivery of 36,000 square metres of new retail space and 45,000 square metres of new office in the town centre. This proposed floorspace has the potential, at typical employment densities, to accommodate 5,600 jobs.?*

*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

**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**

Taylor Wimpey and Bellway have major interests in land to the West of Stafford. The plan has significant implications for their interests and business plans.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Taylor Wimpey/Bellway ( )
Comment ID	PS353
Response Date	28/02/13 10:54
Consultation Point	10 POLICY STAFFORD 3 ? WEST OF STAFFORD ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The policy (vii) requires that the drainage and flood management scheme should include measures to alleviate flooding and surface water management issues on Doxey Brook and tributaries to the River Sow.

The NPPF requires that development itself should not be at significant risk of flooding and that flood risk elsewhere should not be increased. The vast majority of the site lies within Flood Risk Zone 1. Some parts of the site lie within Zone 2, and there are pockets within Zone 3. These areas do not affect the ability to deliver a comprehensive development and can be designed into the development, and measures will be included which overall reduces flood risk across the site. However, the policy appears to seek measures to address off-site, existing flood risk issues. The NPPF requires that flood risk should not be increased elsewhere and that ?where possible? overall flood risk should be reduced.

Measures in site will be introduced which will seek to reduce flood risk overall, but we consider it is unreasonable for the policy to *require* that measures are introduced which will reduce these existing flood risk issues which are not related to the development.

We consider that there is no need to include reference to this issue in policy as it is already governed by the NPPF.

**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.**

*Either delete vii or Amend to read ?drainage and flood management measures will be implemented to ensure that the development is not at significant risk from flooding and that risk elsewhere is not increased. Sustainable Urban Drainage features should be designed and integrated as part of the network of green infrastructure?;*

*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

**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**

Taylor Wimpey and Bellway have major interests in land to the West of Stafford. The plan has significant implications for their interests and business plans.



## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr John Griffiths
Comment ID	PS354
Response Date	27/02/13 21:02
Consultation Point	2.12 Paragraph ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Justified  
. Effective

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The reference in 2.12 to the significant role of Staffs University should now reflect the consultation on whether the university should become a single site university based at Stoke-on-Trent and the consequences on the plan if this were to occur.

**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 Plan needs to be amended to state that the University is considering a move to a single site and should assess the impact of the closure on the employment situation in Stafford Borough

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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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr John Griffiths
Comment ID	PS355
Response Date	27/02/13 21:02
Consultation Point	12 POLICY STONE 1 ? STONE TOWN ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3

**Justified:** the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

**Do you consider that the Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Justified  
. Effective

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

N Policy No 1- Stone Town there is a reference to mixed use development at Westbridge Park. This is inconsistent with the reference in paragraph 8.6 to Westbridge Park as a Destination Park and part of the Green Infrastructure ( as shown on the Stone Town Key Diagram which does not show any mixed use development within the GI area). This is further compounded by the reference in Paragraph 8.13 to a requirement of a further 1400 sq. metres of food retailing in addition to the recent building of an Aldi food store whereas the Policy No1 refers to a need for only 1400sq metres in total. The references to time periods also is confusing with requirements for new retailing by 2026 or 2015 respectively. The Policy for Stone Town is also defective in that it does not fully address the issue of supporting community activities inasmuch as it focusses on recreational activities to the exclusion of cultural activities. The Plan should clearly address this issue bearing in mind the lack of a multi use centre for a broad range of activities (theatrical/performing arts/ dance/exhibitions etc)

**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 Stone Town Policy should be clarified to eliminate the confusion to which I have referred to above. should be amended to include a reference to cultural activities The Policy section dealing with the Town Centre (It is lettered "v" and comes immediately after "d" and before "e") should be amended to broaden the emphasis on cultural activities by the creation of a multi use cultural and performing arts centre.

*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

**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**

I believe the absence of any thorough identification of the cultural requirements of the town of Stone is an important issue which needs to be fully developed at the public examination of the Plan

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Taylor Wimpey/Bellway ( )
Comment ID	PS356
Response Date	28/02/13 10:59
Consultation Point	10 POLICY STAFFORD 3 ? WEST OF STAFFORD ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The requirement is not consistent with criterion xvii. Given Criterion xvii already deals with this issue we consider xi is unnecessary and confusing as it appears to require provision on site.

We also have concerns regarding the approach to SANGs and its underlying justification. We acknowledge that Cannock Chase SAC is vulnerable and that measures are required to safeguard and improve the quality of the habitat. However, we consider that the approach to estimating impact of new housing is unsound and that therefore any request for funding under S106 will potentially fall foul of the CIL Regulations.

The conclusions regarding impact are based on an assumption that dwellings numbers within the zone of influence for the SAC will increase by 10%. Whilst that may be so, the visitor survey sets out no

logical rationale for how and why the increase in dwellings will result in the increase in a 15% increase in population and hence visitors. further assessment of the demographic drivers behind the need for more homes is needed to inform an sound strategy for considering the impact upon and mitigation measures for, the SAC .

The SHMA identifies (para. 4.67) that population is projected to increase by 18,900 in the borough. Of those, 15,800 will be aged over 60 and 11,800 over 75. The SHMA identifies therefore a significant need for provision for elderly persons, especially care provision. Whilst people are in part living longer because they are healthier, it also seems logical to conclude that as the population ages they will make fewer trips to the SAC than an equivalent population with a younger age profile. That would certainly be the case for mountain biking.

A significant driver of the need for new homes is also single person households, for example, through relationship breakdowns and people living longer. Again it is not logical to conclude that more homes means more trips given that many homes will simply be accommodating existing persons living alone.

Given that financial contributions will be sought toward SANGs, more information and analysis is required on the impacts of new housing in order for the approach to be shown to be sound. Given the financial implications that information needs to be available to inform an assessment of the cumulative impact on viability of policies as required by para. 174 of the NPPF.

**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.**

Delete criterion xi as it is unnecessary and confusing.

Further assessment of the demographic drivers behind the need for more homes is needed to inform an sound strategy for considering the impact upon and mitigation measures for, the SAC .

More information and analysis is required on the impacts of new housing in order for the approach to be shown to be sound. Given the financial implications that information needs to be available to inform an assessment of the cumulative impact on viability of policies as required by para. 174 of the NPPF.

*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

**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**

Taylor Wimpey and Bellway have major interests in land to the West of Stafford. The plan has significant implications for their interests and business plans.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Taylor Wimpey/Bellway ( )
Comment ID	PS357
Response Date	28/02/13 11:00
Consultation Point	10 POLICY STAFFORD 3 ? WEST OF STAFFORD ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Justified

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Staffordshire County Council has undertaken a strategic assessment *Transport Evidence to Support a Western Direction of Growth*. That concludes that delivery of the Stafford Western Access will ? *minimise the number of likely congested links and junctions particularly along Newport Road, making Stafford an easier and safer place to access.*? and that construction of ?*Section C of the Western Access Route between Martin Drive, Castlefields, and Doxey Road to provide a second means of access to the Castlefields and Burleyfields, together with an agreed package of sustainable transport interventions?* enables the delivery of the full urban extension. The report does not identify any works required to the A518 Newport Road and its roundabout. This requirement in the policy is not justified or supported by the evidence base. Indeed, the purpose of the SWA is to relieve congested links on Newport Road.

**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.**

Delete from xiii *?and improvements to...its roundabout;?*

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Taylor Wimpey/Bellway ( )
Comment ID	PS358
Response Date	28/02/13 11:01
Consultation Point	10 POLICY STAFFORD 3 ? WEST OF STAFFORD ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Justified

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Xiv and xvi set out different requirements in relation to the Stafford Western Access. CIL Regulation 122 provides that ?a planning obligation may only constitute a reason for granting planning permission if the obligation is:

- necessary to make to the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related to the scale and kind to the development.?

A detailed site specific transport assessment through the development management process will determine the detailed impacts arising from development and hence the appropriate level of contribution which is necessary and reasonable from the development.

There is no need to repeat requirements within the policy; particularly given they are not consistent.

**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.**

Delete xvi and amend xiii to read

*?support delivery of the Stafford Western Access Improvement from Martin Drive to Doxey 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.*

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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**

Taylor Wimpey and Bellway have major interests in land to the West of Stafford. The plan has significant implications for their interests and business plans.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Taylor Wimpey/Bellway ( )
Comment ID	PS359
Response Date	28/02/13 11:05
Consultation Point	10 POLICY STAFFORD 3 ? WEST OF STAFFORD ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Justified  
. Effective

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The SANGs Visitor and Mitigation Reports suggest that SANGs are required largely for walkers and dog walkers. It is unclear therefore that any SANG, if provided on-site, should be provided in association with a MUGA and destination childrens? park (part xx). The purposes and functions seem entirely different. It is suggested that the local plan does not need this level of specificity.

The policy (xx) also requires ?multi-use games areas?. It is also not apparent that more than one MUGA is required.

**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.**

Amend xx to read *?Creation of a new destination park for childrens? play and multi-use games area;?*

**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**

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## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Taylor Wimpey/Bellway ( )
Comment ID	PS360
Response Date	28/02/13 11:08
Consultation Point	10 POLICY STAFFORD 3 ? WEST OF STAFFORD ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Criterion xvii sets out potential measures required to mitigate impacts on Cannock Chase SAC.

We acknowledge that Cannock Chase SAC is vulnerable and that measures are required to safeguard and improve the quality of the habitat. However, we consider that the approach to estimating impact of new housing in the evidence base is unsound and that therefore any request for funding or provision on-site under S106 will potentially fall foul of the CIL Regulations.

The conclusions regarding impact are based on an assumption that dwellings numbers within the zone of influence for the SAC will increase by 10%. Whilst that may be so, the visitor survey sets out no logical rationale for how and why the increase in dwellings will result in the increase in a 15% increase

in population and hence visitors. further assessment of the demographic drivers behind the need for more homes is needed to inform an sound strategy for considering the impact upon and mitigation measures for, the SAC .

The SHMA identifies (para. 4.67) that population is projected to increase by 18,900 in the borough. Of those, 15,800 will be aged over 60 and 11,800 over 75. The SHMA identifies therefore a significant need for provision for elderly persons, especially care provision. Whilst people are in part living longer because they are healthier, it also seems logical to conclude that as the population ages they will make fewer trips to the SAC than an equivalent population with a younger age profile. That would certainly be the case for mountain biking.

A significant driver of the need for new homes is also single person households, for example, through relationship breakdowns and people living longer. Again it is not logical to conclude that more homes means more trips given that many homes will simply be accommodating existing persons living alone.

Given that financial contributions will be sought toward SANGs, more information and analysis is required on the impacts of new housing in order for the approach to be shown to be sound. Given the financial implications that information needs to be available to inform an assessment of the cumulative impact on viability of policies as required by para. 174 of the NPPF.

**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.**

Given that financial contributions will be sought toward SANGs, more information and analysis is required on the impacts of new housing in order for the approach to be shown to be sound. Given the financial implications that information needs to be available to inform an assessment of the cumulative impact on viability of policies as required by para. 174 of the NPPF.

*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

**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**

Taylor Wimpey and Bellway have major interests in land to the West of Stafford. The plan has significant implications for their interests and business plans.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Taylor Wimpey/Bellway ( )
Comment ID	PS361
Response Date	28/02/13 11:14
Consultation Point	25 ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The policy seeks 30% affordable housing from sites at Stafford. We are concerned that the evidence base does not support the Council's approach of seeking 30% affordable housing.

The review of viability assumptions considers 2 levels of S106 and on-site infrastructure costs ( 5,000 and 12,000 per house) in relation to strategic housing sites (over 500 homes). It is Savills experience that on-site infrastructure alone (ie excluding S106) on strategic sites is around 20,000 per house. The Harman report on viability testing puts on-site servicing for strategic sites (again excluding S106 contributions) at between 17,000 & 23,000 per unit. Both are significantly in excess of Level's assumptions for on-site servicing **plus** S106 costs. It is also unclear what assumptions are being made regarding contributions toward the costs of SANGs.

The viability assessment allows 600 per dwelling for the cost of lifetime homes. The DCLG document *Assessing the Cost of Lifetime Homes Standards* (DCLG, July 2012) assesses the cost to be much higher. Page 22 of the report assesses that the cost of building to Lifetime Homes standards is as follows (figures rounded):

2 bed terrace 1,394

3 bed terrace (example 1) 2,966

3 bed terrace (example 2) 586

4 bed semi 1,153

The average cost is 1,525 per dwelling. This Viability Study downplays the costs and this will have a bearing on the viability of development.

We are concerned with an approach which appears to suggest policy should be based on future uplifts in value. The plan needs to be based on market conditions today and reviewed as and when they improve. We disagree with the suggestion that sites on the edge of Stafford in urban extensions should take their values from rural postcodes. Values at Stafford will be set by the predominant form of housing in the market ? the existing housing stock of the town.

The evidence base does not demonstrate that 30% affordable housing can be delivered. An assessment in accordance with NPPF para. 173 is required

**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.**

An assessment in accordance with NPPF para. 173 is required

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**If you wish to participate at the Examination in Public, please outline why you consider this to be necessary**

Taylor Wimpey and Bellway have major interests in land to the West of Stafford. The plan has significant implications for their interests and business plans



## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr J R Prichard
Comment ID	PS362
Response Date	28/02/13 10:04
Consultation Point	2 SPATIAL PRINCIPLE 2 (SP2) ? STAFFORD BOROUGH HOUSING & EMPLOYMENT REQUIREMENTS ( <a href="#">View</a> )
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 Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

1. Housing Development Strategy Gnosall, named as a Key Service Village in para 6.25 of the Plan, has since approx 1970 been overloaded with housing development. At the start of this period the village contained nowhere near the degree of services that it does currently and as a consequence it could be said that the services have grown with the development. Also it needs to be highlighted that it has very little employment and is in effect a 'dormitory village' to Stafford, Stoke, Wolverhampton, Birmingham, the Black Country and the Potteries generally. I would suggest that most of these comments apply to all 11 Key Villages named. I consider it to be grossly unjust to add further to the development of the Key Villages as proposed, and especially to the largest of these, namely Gnosall thus creating them into small towns. As an alternative policy I suggest that all villages in the Stafford Borough Council Area should be included in the Plan as potential development sites.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr J R Prichard
Comment ID	PS363
Response Date	28/02/13 10:04
Consultation Point	12.22 Paragraph ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

1. Wind Turbines The Plan also makes provision for the possible inclusion of 2 wind turbines in the Area. This would cause a further invasion of the countryside and rural scene and should be avoided at all cost. Enough damage has already been done by overdevelopment of housing, plastic sheeting on farmland, proposed rail development etc.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	St Modwen
Comment ID	PS364
Response Date	28/02/13 11:16
Consultation Point	7.36 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

These representations are made on behalf of St Modwen who own land north of Milford Road, Walton on the Hill as identified in red on drawing 3013-99A.

Objection is raised to the Settlement Boundary identified for Stafford on the Policies Map in so far as it relates to St Modwen's land at Milford Road, Walton on the Hill. The land edged red is well contained by established trees and hedgerows as evident from the submitted topographical survey (Reference: 11/087/01a - submitted under separate cover).

The application site is presently used for the open storage of motor vehicles in association with Walton Garage which lies immediately to the south of the site. The site is contained to the east by existing residential development recently undertaken off Meadowsweet Drive. The site is physically contained

to the north and west by mature landscape features that are addressed in the submitted Arboricultural Assessment. The site comprises an extensive hardstanding that is presently used for the open storage of some 50 vehicles. The site is to be regarded as comprising previously developed land.

It is submitted, that when defining a Settlement Boundary they should be clearly defined, using readily recognisable features such as roads, streams, belts of trees or woodland edges. The proposed Stafford Settlement Boundary at Milford Road, Walton on the Hill does not follow readily recognisable features; in the case of the land identified in red on drawing 3013-99A, the proposed Settlement Boundary follows an arbitrary line taken across the centre of the site.

The NPPF advises that (paragraph 154) Local Plans should be realistic and include only policies that provide a clear indication of how a decision maker should react to a development proposal.

The Plan for Stafford, in order to be sound, has to be based on a credible and robust evidence base. It is respectfully submitted that the Policies Map should be amended as follows:

- 1 Amend Stafford Settlement Boundary at Milford Road, Walton on the Hill, so as to follow well defined landscape features along the northern and western boundaries of the site identified in red on drawing 3013-99A.
- 2 The site identified in red on drawing 3013-99A should be included within the Stafford Settlement Boundary at Milford Road, Walton on the Hill.

**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 Plan for Stafford, in order to be sound, has to be based on a credible and robust evidence base. It is respectfully submitted that the Policies Map should be amended as follows:

- 1 Amend Stafford Settlement Boundary at Milford Road, Walton on the Hill, so as to follow well defined landscape features along the northern and western boundaries of the site identified in red on drawing 3013-99A.
- 2 The site identified in red on drawing 3013-99A should be included within the Stafford Settlement Boundary at Milford Road, Walton on the Hill.

*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.*

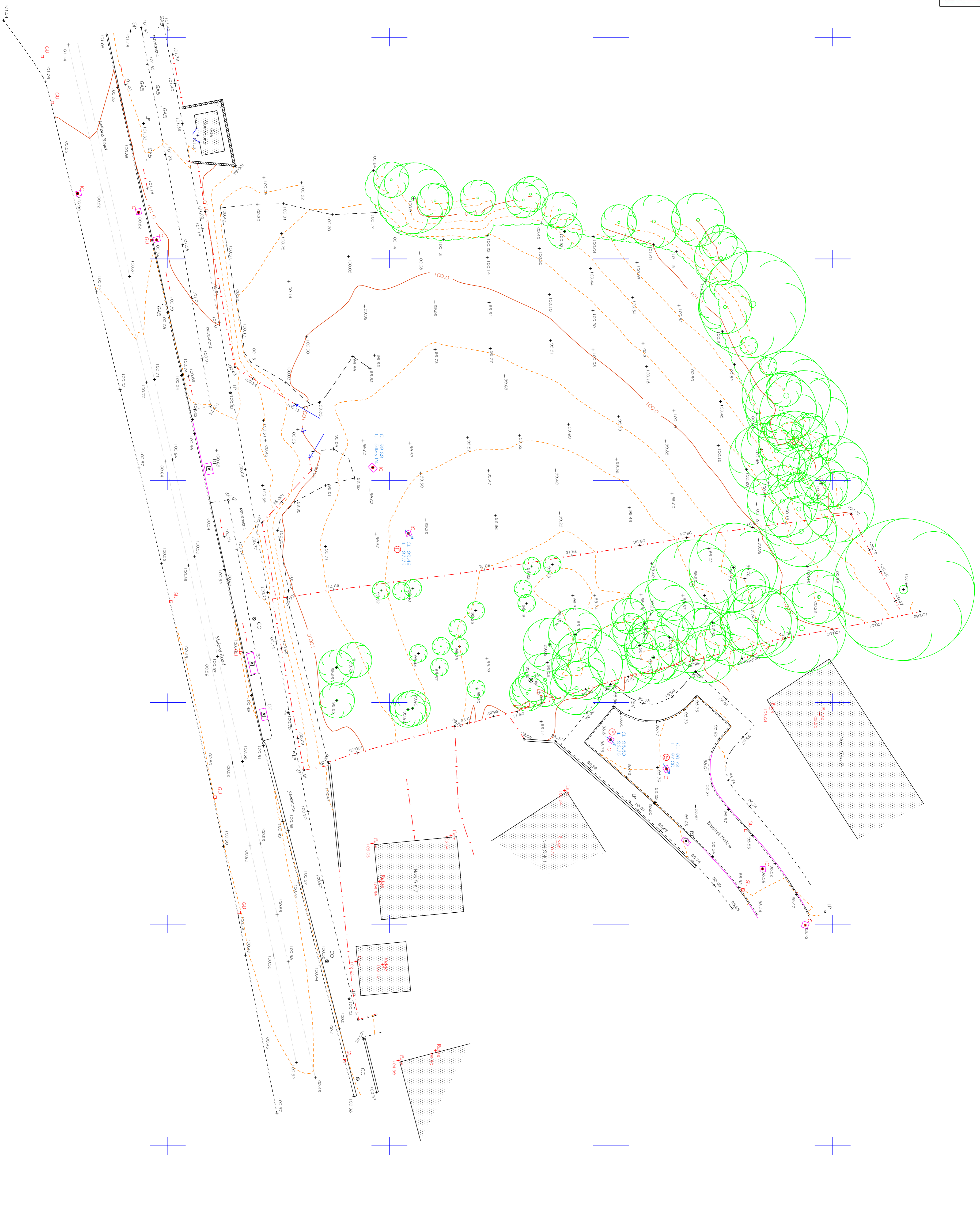
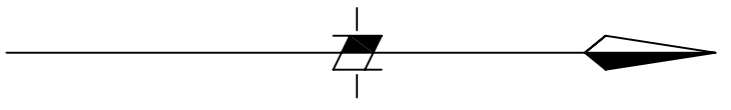
After this stage, further submissions will only be at the request of the Planning Inspectorate, based on the matter and issues he / she identifies for examination

**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

**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**

In order to appraise the Inspector of how the Plan should be amended to achieve soundness.



1:200  
MJs/A1  
Dec 2011 11/08701a

**Survey Key:-**

- B0 Bolioid
- B9 Bolioid Beacon
- BT BT Cover
- BT Telephone Control Box
- CB Local Road
- CH Local Road Cover
- CM Concrete
- CP Concrete
- EP Electricity Pole
- FH Fire Hydrant
- FT Face Profile Target
- GU Gas Valve
- GV Gas Valve
- IC Inspection Chamber Cover
- LB Letter Box
- LD Lamp Post
- MD Manhole (Damage Channel)
- MC Manhole Cover (round)
- MP Marker Post
- RWP Rain Water Pipe
- SW Water Stop Valve
- SV Sewer Valve
- TCB Telephone Call Box
- TL Telegraph Pole
- TP Traffic Light
- TV Cable TV Cover
- WM Water Meter Cover

- BSM Survey Control Station
- TP Trail Pt
- W1 134.87 Benchline
- W2 134.87 Water Level (with date measured)
- 2101010 Spot Level
- + 134.87
- 134.87 Tree (refer to scale)
- Drainage Feature - Storm Drain
- Drainage Feature - Foul Drain

- LineTypes**
- Fence Line
  - Electricity Transmission Line
  - Hedge
  - Rock Face
  - Embankment Slope
  - Contour Lines
  - Gas Pipeline
  - Water Pipeline

Some of these symbols may not appear on this drawing

(c) The Intellectual Copyright of the data in this drawing belongs to Beacon Land Surveys Limited 2011

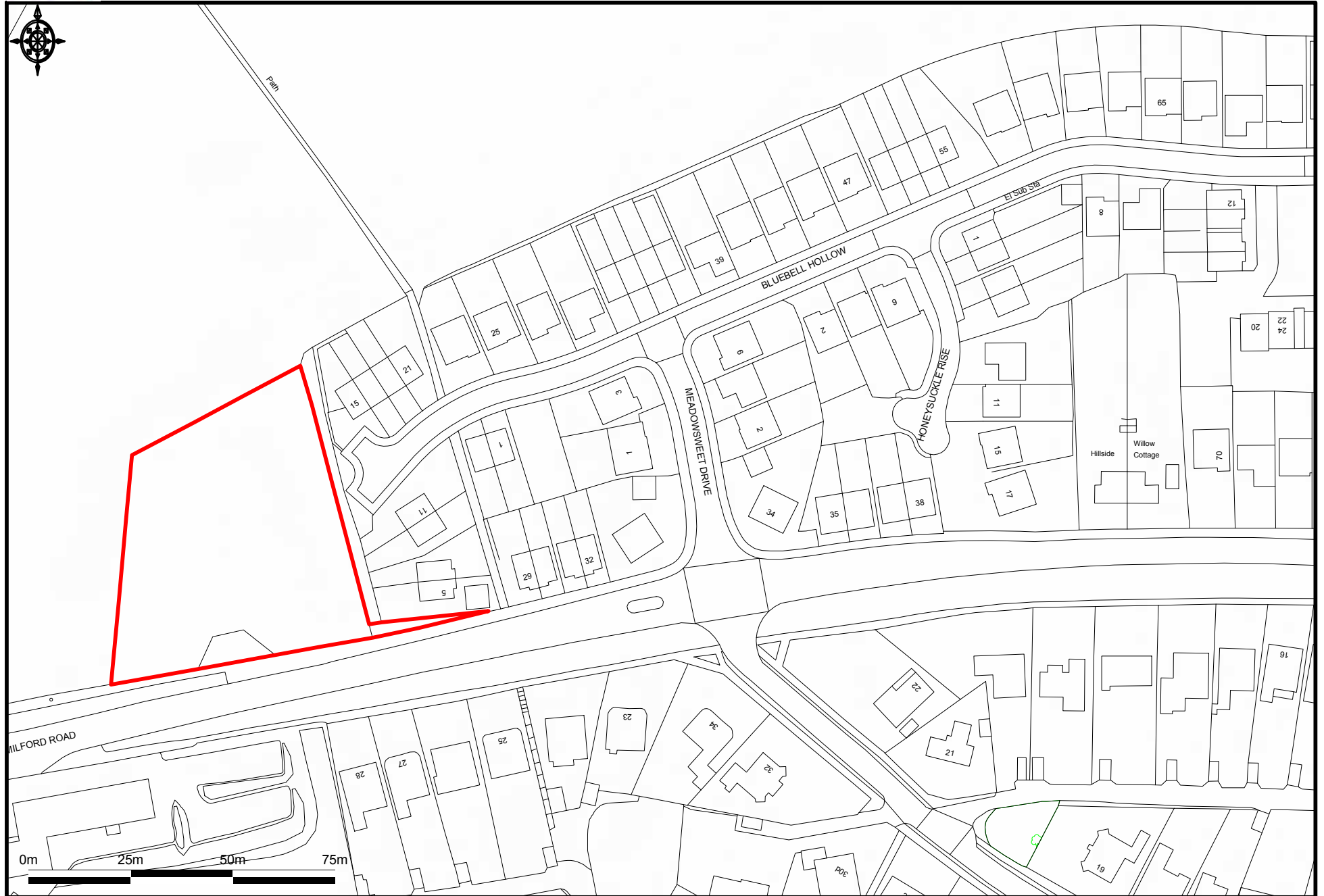
**Beacon Land Surveys**  
 The Lodge  
 Greenhough Road  
 Lichfield  
 Staffs, WS13 7AU  
 Tel : 01 543 417399  
 Fax : 01 543 417267  
 email :- office@beaconlandsurveys.co.uk

**Project:**  
 Land at Milford Road  
 Baswich, Staffs

**Drawing:**  
 Site Detail & Level Survey

**Scales:**  
 1:200  
 MJs/A1

**Date:**  
 Dec 2011 11/08701a



## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Staffordshire Wildlife Trust (Miss Kate Dewey)
Comment ID	PS365
Response Date	28/02/13 11:22
Consultation Point	8 POLICY STAFFORD 1 ? STAFFORD TOWN ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Both Riverside and Kingsmead development sites are in the floodplain, which is inconsistent with other policies in the document.

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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





Our ref: JS/RW11/990

28<sup>th</sup> February 2013

Head of Planning & Regeneration  
Stafford Borough Council  
Civic Centre  
Riverside  
Stafford  
ST16 3AQ

**By Post and Email ([forwardplanning@staffordbc.gov.uk](mailto:forwardplanning@staffordbc.gov.uk))**

Dear Sir or Madam

**The Plan for Stafford Borough, Publication Version - Public Consultation January and February 2013.  
Representation on Behalf of Grasscroft Homes and Property Limited for Land off Knightly Road, Gnosall, Stafford.**

HOW Planning has been instructed by Grasscroft Homes and Property Limited ('Grasscroft') to submit representations towards Stafford Borough Council's (SBC) 'The Plan for Stafford Borough Publication Version' document ('Plan for Stafford') as part of the January and February 2013 consultation period.

Grasscroft have previously submitted representations to the Council's Strategic Housing Land Availability Assessment (SHLAA), Core Strategy 'Local Choices' consultation, Core Strategy 'Draft Publication' consultation and The Plan for Stafford Borough Strategic Policy Choices document all in respect of a site off Knightly Road, Gnosall, Stafford (SHLAA site id: 18) - with the SHLAA assessing the site as being developable. Grasscroft can confirm that they still have control over this land and that they are promoting it for residential development in the short term. For reference a site plan is enclosed with this representation.

This representation provides a response to each of the following question areas identified in the accompanying guidance notes:

- Has the plan been positively prepared;
- Is the plan justified;
- Is the plan effective;
- Is the plan consistent; and
- Is it legally compliant.

As requested, we have used the representation form and provided our reasoned justification as to why we find the Plan for Stafford to be unsound and the amendments that would be required to ensure that the plan meets the requirements identified above.

It is respectfully requested these representations are fully considered in the preparation of the forthcoming LDF documents.

**Planning and Environmental Advisers**

**Partners:**

Gary Halman BSc FRICS MRTPI  
Richard Woodford BA (Hons) BSc BTP MRICS MRTPI  
Fiona Woodford  
Julie Halman

**Associates:**

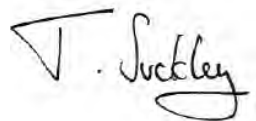
Carol Clarke BA (Hons) MTP1 MRTPI  
Jon Suckley MTCP (Hons) MRTPI  
Richard Barton BSc (Hons) MA MRTPI

**HOW Planning LLP**

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HOW Planning LLP is a Limited Liability Partnership  
Any reference to Partner means a member of HOW Planning LLP

We would be grateful if you could confirm safe receipt of this representation. Should you require any further information on the content of this representation please do not hesitate to contact me on the details provided below.

Yours faithfully,

A handwritten signature in black ink that reads "Jon Suckley". The signature is written in a cursive style with a large initial 'J'.

**JON SUCKLEY**  
**ASSOCIATE**

Direct Line: 0161 831 5878

Email: [jon.suckley@howplanning.com](mailto:jon.suckley@howplanning.com)

Enc. Site Location Plan  
Consultation Representations Form

Cc. Grasscroft Homes and Property Ltd



**The Plan for Stafford Borough  
Pre-Submission Consultation**

**Ref:**

**Representations Form**

**(For official  
use only)**

**Please return completed forms to:**

- Head of Planning & Regeneration, Stafford Borough Council, Civic Centre, Riverside, Stafford, ST16 3AQ
- or by email to [forwardplanning@staffordbc.gov.uk](mailto:forwardplanning@staffordbc.gov.uk)
- or by fax to: 01785 619473

**Responses must be received by 12 noon on Thursday 28<sup>th</sup> February 2013**

**This form has two parts:**

**Part A:** Personal Details

**Part B:** Your representations.

- Please complete Part B of this form for each representation you wish to make. You do not need to complete Part A more than once, but please ensure you state your name or organisation as applicable at the top of each Part B form you submit.
- Please refer to the attached guidance notes on making representations so that they address issues of legal compliance and / or soundness.
- Please note that when representations are submitted only Part B of the form will be published. Contact details on Part A will not be published.

# Part A

## 1. Personal Details\*

\*If an agent is appointed please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

## 2. Agent's Details (if applicable)

Title	<input type="text"/>	Mr
First Name	<input type="text"/>	Jon
Last Name	<input type="text"/>	Suckley
Job Title	<input type="text"/>	Associate
Organisation	Grasscroft Homes and Property Limited	HOW Planning
Address Line 1	C/o HOW Planning	40 Peter Street
Address Line 2	<input type="text"/>	Manchester
Address Line 3	<input type="text"/>	<input type="text"/>
Address Line 4	<input type="text"/>	<input type="text"/>
Postcode	<input type="text"/>	M2 5GP
Telephone Number	<input type="text"/>	0161 835 1333
E-mail address	<input type="text"/>	Jon.suckley@howplanning.com

## Part B – Please use a separate sheet for each representation

Name or Organisation	HOW Planning on behalf of Grasscroft Homes and Property Limited
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### 3. What part of The Plan for Stafford Borough (including the Policies Maps document) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	Section 6 – Development Strategy Particularly Policies SP1 and SP2
---	---

*If your comment does not relate to a specific part of the document, or it relates to a different document, for example the Sustainability Appraisal, please make this clear in your response.*

### 4. Do you consider that the Plan for Stafford Borough is:

a. Legally compliant\*?

Yes  No

b. Sound\*?

Yes  No

*To check a box when completing this form electronically, double click on it and select 'checked' under default value.*

*\*Please refer to the attached note for guidance on legal requirements and soundness.*

*If you have entered **No** to Q4.b. please continue to Q5. In all other circumstances please go to Q6.*

### 5. Do you consider The Plan for Stafford Borough is unsound because it is not:

a. Positively Prepared



b. Justified



c. Effective



d. Consistent with national policy



6. Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.

Grasscroft Homes and Property Limited ('Grasscroft') has serious concerns regarding the soundness of the Pre-Submission version of the Plan for Stafford, in particular the Development Strategy outlined in Section 6. The Development Strategy establishes the scale of housing & employment Borough-wide for the Plan period to 2031.

### **Policy SP1 – Presumption in Favour of Sustainable Development**

Grasscroft strongly agrees with the Stafford Borough Council's ('SBC') incorporation of the presumption in favour of sustainable development into the Draft Local Plan. This presumption is at the very heart of national planning guidance contained within the NPPF and should be seen as a 'golden thread running through both plan-making and decision-taking' (NPPF (March 2012), page 4, paragraph 14). It is therefore essential to ensure that the most appropriate levels of development are met in the right places and at the right time to support sustainable economic growth in line with the Ministerial Statement on 'Planning for Growth'. Grasscroft request that the presumption in favour of sustainable development be retained in the Local Plan to ensure consistency with national policy.

### **Policy SP2 - Stafford Borough Housing & Employment Requirements**

Grasscroft are seriously concerned that the housing land supply calculation for Stafford Borough is diverging from numerous, recent appeal decisions issued by the Planning Inspectorate. The Council's housing calculation must supply specific deliverable sites, sufficient to provide five years' worth of housing against housing requirements, with an additional 5% or 20% (when based on past delivery in the Borough) buffer, to ensure choice and competition in the market. Whilst it is appreciated that the majority of housing growth will be delivered in Stafford, Key Service Villages, such as Gnosall, are vitally important if SBC are to deliver a reliable and credible delivery of housing growth over the plan period.

#### **5 Year Housing Land Supply**

SBC's current definition of deliverable housing, and in turn their 5 year housing supply methodology, is flawed when reviewed in line with recent appeal decisions issued by the Planning Inspectorate and as such this has serious implications for the soundness of the Draft Local Plan.

An important appeal decision was issued on 23<sup>rd</sup> August 2012 which permitted the grant of a residential development in Chapel-en-le-Frith, High Peak, submitted by Barratt Homes (Appeal ref: APP/H1033/A/11/2159038).

At paragraph 10 the Planning Inspector confirms that sites without planning permission should not be included in the 5 year supply:

*'The most up-to-date planning policy document, the National Planning Policy Framework (the Framework), was issued in March 2012. The Framework at para. 47 requires that local planning authorities should ... identify and update annually a supply of specific deliverable sites sufficient to provide 5 years' worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the Plan period) to ensure choice and competition in the market for land. Footnote 11 to para. 47 explains that to be considered deliverable, sites should be available now... and be achievable with a realistic prospect that housing will be delivered on the site within 5 years .... Footnote 11 states that sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within 5 years, for example they will not be viable.... The inclusion of the phrase until permission expires strongly implies that a site which no longer has – or, significantly, has not yet received – planning permission for housing is not to be considered deliverable in the terms of the Framework.'*

Another appeal decision of interest was issued on 29<sup>th</sup> August 2012 which allowed the grant of a residential development in Wincanton, South Somerset, submitted by Hopkins Developments Ltd (Appeal ref: APP/R3325/A/12/2170082). This recent appeal decision reiterates this approach, and at

paragraph 30, which states:

*'The Framework advises that to be considered deliverable, sites should be available now. Accordingly, sites without planning permission should not be included in the supply....'*

The above appeal decisions surmised that sites that do not have planning permission should not be included within the calculation of the 5 year housing land supply position.

Also of importance is the detail provided with the use of windfall allowances in the calculation of the 5 year housing supply figures. This is discussed at paragraph 31, which states:

*'The Framework specifically states that an allowance may be made for windfall sites. The Council has calculated the historic numbers of windfall sites per annum by subtracting the key sites and those on residential garden plots from the number of completions. An allowance for windfalls has then been made taking account of the existing windfall supply which is already included as sites with planning permission. This results in a total number of 717 windfalls which represents about 15% of the Council's total supply and so does not seem to me to be an excessive contribution. However, with no significant changes in circumstances, the number of opportunities for windfall developments coming forward, by definition, decreases in time. While I conclude the historic trend provides compelling evidence that there would be a reliable source of supply in the future, in my opinion a moderate reduction should be made to ensure the allowance is realistic.'*

Whilst the above appeal decision acknowledges that windfall sites can be used in the calculation of the 5 year housing supply figures, it concludes that windfall sites should be used prudently in order to ensure the housing supply target is based on a reliable source.

#### *Previous under-delivery of housing*

An important consideration of the NPPF is the addition of the implications on Local Authorities in respect of previous under-delivery of housing. Paragraph 47 of the NPPF states:

*'Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land.'*

With regards to this 20% buffer the appeal decision issued at the Former Castleworks site in Stafford (Appeal Ref: APP/Y3425/A/12/2172968) is an important consideration. The Planning Inspector here concurred with the appellants view that when utilising the most up-to-date evidence base (RSS Phase II revision), Stafford Borough Council have only met their annual housing target on one occasion in the past 6 years. **This was found to justify 'persistent under delivery' and therefore a 20% buffer should be imposed in line with the NPPF.**

#### Summary

Considering all of the above, Grasscroft are of the opinion that at present, **SBC's** housing target methodology is flawed and therefore Section 6 of the pre-submission version of the Local Plan, which establishes the scale of housing provision in Stafford for the plan period to 2031, is unsound.

The Local Plan has not been positively prepared as Stafford Borough Council have not used a robust methodology to calculate current and future housing supply position. The provision of an increased housing target would provide far greater scope to meet the housing requirements for the entirety of the Plan period. This would also be in-line with Paragraph 182 of the National Planning Policy Framework which states that Local Plans should be positively produced for them to be considered sound. Paragraph 182 states:

*'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.'*

It is also self-evident that the Local Plan is not justified as the evidence base which supports the Council's housing land position is not robust or credible.

Furthermore, the Plan for Stafford is not effective as the plan cannot be appropriately delivered over the plan period, due to the flawed housing land position.

Furthermore, Grasscroft assert that it is crucially important that the Council can demonstrate a 5 year supply of housing land as stipulated in the NPPF. This conflict with the NPPF is a clear assertion that the Local Plan is not consistent with national policy.

(attach separate sheets as necessary)

**7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough legally compliant or sound, having regard to the test you have identified at question 5. You will need to say why this change will make the document legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Grasscroft have suggested a number of alterations that need to be made to the draft Local Plan before it is considered to pass the NPPF test of soundness; namely that it has been positively prepared, that it is effective, justified and consistent with national policy.

Grasscroft do agree with the inclusion of the presumption in favour of sustainable development. This is to be maintained in order to ensure that appropriate levels of development come forward at the right times and in the right places. However, the housing requirement and supply policies are unclear, ineffective and not positively prepared.

The housing requirement should be initially based on the RSS requirement but also the shortfall in previous years, projected demolitions and the 20% buffer over Plan period. However, this should be phased so that the shortfall is met within the first 5 years. As the Council cannot demonstrate a 5 year supply of housing land additional sites must come forward. In order to ensure an adequate supply in the short term, the release of some Green Belt land is required. This should be reviewed immediately. Whilst it is appreciated that the wealth of housing delivery is proposed in Stafford, the potential for housing delivery in Key Service Settlements, such as Gnosall, should not be overlooked.

***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 ensure that the modifications sited above are clearly brought to the attention of the Inspector and discussed appropriately at the Examination in Public.

**Please note** the Planning Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the Examination in Public

**Please ensure you have printed your name or organisation at the top of this form**

**The Plan for Stafford Borough  
Pre-Submission Consultation**

**Representation Form Guidance Notes**



Representations made within the consultation period will be considered alongside The Plan for Stafford Borough: Submission as part of an examination by an independent planning inspector. The purpose of the examination is to establish whether the plan has been prepared in accordance with **legal requirements**, and whether it is **sound**.

**Representations should therefore focus on legal compliance and soundness.**

If you wish to make a comment seeking to change The Plan for Stafford Borough you should make clear in what way you consider it is not legally compliant or sound. You should try to support your comment by providing evidence and supporting information showing why it should be changed. It will be helpful if you also say precisely how you think it should be changed.

For the plan to be **legally compliant** it must:

- be prepared in accordance with:
  - the Council's Local Development Scheme (a timetable for plan preparation);
  - the Council's Statement of Community Involvement (which includes the Council's policy for community engagement on The Plan for Stafford Borough) and
  - relevant Acts and Regulations; in particular the Town and County Planning (Local Planning) (England) Regulations 2012;
- have been subject to sustainability appraisal;
- have regard to:
  - national policies, advice and guidance issued by the Secretary of State; and
  - the Stafford Borough Sustainable Community Strategy and Stafford Borough Community Action Plan;
- be in general conformity with the Regional Spatial Strategy for the West Midlands;
- meet legal requirements under the Duty to Co-operate (introduced via the Localism Act 2011).

**Soundness** is explained in the National Planning Policy Framework. For a plan to be sound it must be:

- **Positively prepared** - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements;
- **Justified** – the plan should be the most appropriate strategy based on a robust and credible evidence base;

- **Effective** – the plan should be deliverable over its period;
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

Where there are groups who share a common view on how they wish to see The Plan for Stafford Borough changed, it would be very helpful for that group to send a single comment rather than for a large number of individuals to send in separate comments which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.





Knightley Rd

Knightley Rd

Old Barn Close

Horton Close

Elmwood Close

Avonmore Rd

Chestnut Close

Knightley Rd

Brookhouse Rd

Ashmore Dr

Avonmore Rd

Ellen Way

Gene Hall Close

The Pines

Shenmore Way

Brookhouse Rd

Brook Close

1st Way

Avonmore Rd

Greenfields

Manor

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Taylor Wimpey/Bellway ( )
Comment ID	PS367
Response Date	28/02/13 11:30
Consultation Point	30 Policy C7 ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Justified  
. Effective

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Appendix G sets out standards for open space provision. Para. 11.23 states that this equates to 34 sq.m. per person, although totalling the figures in Appendix G gives a figure of 35.91 sq.m., or 46 sq.m. if the rural provision is added. The former figure equates to 3.59 ha per 1,000 population and the latter to 4.6 Ha per 1,000 population, compared to the former Six Acre Standard of 2.4 Ha. Any requirement for SANGs would appear to be additional to this. The significant increase in provision appears to be derived from increases in amenity/informal green spaces. The figure in the PPG17 assessment is said to be higher than existing provision without any justification as to why new development should provide higher levels of open space.

**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.**

Further justification is required as to the levels of open space provision being sought from new development.

*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

**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**

Taylor Wimpey and Bellway have major interests in land to the West of Stafford. The plan has significant implications for their interests and business plans.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Staffordshire Wildlife Trust (Miss Kate Dewey)
Comment ID	PS368
Response Date	28/02/13 11:31
Consultation Point	34 Policy N4 ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Policies regarding biodiversity are generally well prepared, but may not result in reducing in biodiversity loss unless no net loss is specified. The NPPF advocates 'moving from a net loss of bio-diversity to achieving net gains for nature;'

Stafford Borough has lost biodiversity in the last 20 years, and the plan needs to not only sustain but enhance and restore natural assets, to comply with NPPF:

117. To minimise impacts on biodiversity and geodiversity, planning policies should:

- ? plan for biodiversity at a landscape-scale across local authority boundaries;
- ? identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of



importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation;

? promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan;

The biodiversity evidence base is not sufficient to properly inform selection and design of allocation sites, as it is a desk study only, and information on local wildlife sites, ecological networks and the presence of priority species in allocated areas is not up to date.

**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.**

Up to date survey and mapping of local wildlife sites, BAP habitats, ecological networks.

Revised and updated GI strategy with no 'white' areas, and more detailed specifications for identified project areas

Policies stating no net loss of biodiversity on development sites, covering all important habitats and species, not just relating to recognised areas of biodiversity importance.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Taylor Wimpey/Bellway ( )
Comment ID	PS369
Response Date	28/02/13 11:32
Consultation Point	32 Policy N2 ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The policy requires non-residential to meet certain BREEAM levels. The Policy requires developers to demonstrate that such an approach is not viable. That approach is fundamentally in conflict with the NPPF, para. 174, which requires policies be subject to assessment for their likely cumulative impacts on development of "...all existing and proposed local standards, supplementary planning documents and policies that support the development plan...? It does not appear that such an assessment has been carried out and hence it is not possible to conclude that the cumulative impact of standards and policies would not put implementation of the development strategy at serious risk.

We are also concerned that BREEAM as a tool is regularly reviewed regularly reviewed to ensure that *Excellent* is always in advance of the standards in building regulations. Accordingly, once changes to the Building Regulations are made in 2013, what is currently BREEAM *Excellent* will become BREEAM

*Very Good*, and a standard in advance of current *Excellent* will become the new *Excellent*. The policy therefore requires developers to comply with a standard which may not yet be known. It also requires developers to comply with a standard which is completely outside of the Council's own control and could change significantly. The Building for Life standards are a good example of this. The 2012 BFL is completely different to that which preceded it.

**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.**

Delete requirement for meeting BREEAM standards

*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

**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**

Taylor Wimpey and Bellway have major interests in land to the West of Stafford. The plan has significant implications for their interests and business plans

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Staffordshire Wildlife Trust (Miss Kate Dewey)
Comment ID	PS370
Response Date	28/02/13 11:37
Consultation Point	7.8 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Effective

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Stafford Town Key diagram is unclear -olive green areas are not labelled in key. Northern most GI area is labelled Existing GI, when in Stafford North Concept Plan it is marked as New green infrastructure.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Taylor Wimpey/Bellway ( )
Comment ID	PS371
Response Date	28/02/13 11:37
Consultation Point	31 Policy N1 ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

We are concerned that the plan requires compliance with the Building for Life standard which is outside the local authority's control and which could change significantly. Such changes could affect the viability of development and would not have been subject to an assessment for the cumulative impact on viability as required by the NPPF. The Building for Life standards are a good example of this. The 2012 BFL is completely different to that which preceded it.

**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.**

Delete criterion c.

*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

**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**

Taylor Wimpey and Bellway have major interests in land to the West of Stafford. The plan has significant implications for their interests and business plans

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Staffordshire Wildlife Trust (Miss Kate Dewey)
Comment ID	PS372
Response Date	28/02/13 11:40
Consultation Point	7.21 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Justified  
. Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Options or reducing volumes of foul water by removing surface water volumes from combined sewer networks via retro fitting of SuDs should be considered, as potentially more cost effective and beneficial to landscape and amenity.

**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.**

Feasibility study for retro-fitting of SuDs for surface water control

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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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Taylor Wimpey/Bellway ( )
Comment ID	PS373
Response Date	28/02/13 11:41
Consultation Point	36 Policy N6 ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The policy requires that mitigation measures are secured prior to development being approved. Clearly such measures can not be secured ahead of a S106 agreement being signed and planning permission being issued.

The policy delegates decision to a document outside of the council's control - the Cannock Chase Visitor Impact Mitigation Implementation Plan. That plan has not been subject of scrutiny. Its approach needs to be set out in the development plan, where it can be tested of its impact and subject of an assessment of the cumulative impact on viability of standards, as required para. 174 of the NPPF.

The 12 mile zone of influence is not supported by the 2012 Visitor Survey Report which suggests a 15km (9 miles) cut off. However, more information and analysis is required on defining the zone of influence and therefore the contribution zones in order for the approach to be shown to be sound.

**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 detailed approach needs to be set out in the development plan, where its implications can be tested for its impact and subject of an assessment of the cumulative impact on viability of standards, as required para. 174 of the NPPF.

The 12 mile zone of influence is not supported by the 2012 Visitor Survey Report which suggests a 15km (9 miles) cut off. However, more information and analysis is required on defining the zone of influence and therefore the contribution zones in order for the approach to be shown to be sound.

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## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Taylor Wimpey/Bellway ( )
Comment ID	PS374
Response Date	28/02/13 11:44
Consultation Point	13.24 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Justified  
. Effective

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The table sets out from where contributions are expected to be raised. It is unclear why in a number of instances contributions will be sought from strategic schemes, but not other smaller schemes.

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Further explanation is required as to from where contributions will be sought.

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## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Staffordshire Wildlife Trust (Miss Kate Dewey)
Comment ID	PS375
Response Date	28/02/13 11:47
Consultation Point	7.28 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Justified  
. Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

New green infrastructure areas have not been planned with the benefit of up to date information on local wildlife sites or ecological networks in the area, and make no reference to the borough Green infrastructure Strategy or Staffordshire Biodiversity Action Plan. The GI areas are not based on any requirements for species or habitat mitigation necessary as part of the development of the sites.

**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.**

Further information on important habitats and species in and around the allocation sites, GI areas designed to positively enhance and link existing habitats.

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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



Head of Planning and Regeneration  
Stafford Borough Council  
Civic Centre  
Riverside  
Stafford  
ST16 3AQ

SENT BY E-MAIL AND POST

28 February 2013

Dear Sir / Madam

### **STAFFORD BOROUGH PLAN – PRE SUBMISSION PUBLICATION**

Thank you for consulting with the Home Builders Federation (HBF) on the Stafford Borough Plan Pre Submission Publication.

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

We would like to submit the following representations on the Stafford Borough Plan Pre Submission Publication.

We would also wish to appear at the Examination in Public (EIP) to debate these matters in greater detail.

### **Duty to co-operate**

Under Paragraph 181 of the National Planning Policy Framework (NPPF), Local Authorities are expected to demonstrate evidence of having effectively co-operated to plan for issues with cross boundary impacts when their local plans are submitted for examination.

Stafford Borough Council is centrally located in Staffordshire with nine neighbouring local authorities. The Plan for Stafford Borough – Publication Consultation Statement (January 2013) Section 3 Compliance with Duty to co-operate demonstrates only limited consultation with neighbouring authorities on housing issues. This consultation shows joint working on the Strategic Housing Market Assessment (SHMA) 2008 Northern with Stoke on Trent City Council, Newcastle under Lyme Borough Council, Staffordshire Moorlands

District Council and East Staffordshire Borough Council together with collaboration on Strategic Housing Land Availability Assessment (SHLAA) with South Staffordshire Borough Council. Paragraph 6.12 of the Stafford Borough Plan states that household projection figures are made up of 30% local need and 70% in-migration from surrounding areas mainly from Cannock Chase District Council, South Staffordshire District Council and Stoke on Trent City Council.

Since the proposed abolition of the West Midlands Regional Assembly and its Regional Spatial Strategy (RSS), there has been a significant drop in the collective level of housing provision envisaged by local authorities in the region. The WMRSS remains a valid planning consideration until it is revoked later this year. The former WMRSS was informed by an objective of urban renaissance, whereby the Metropolitan Urban Areas (MUA) would absorb large numbers of future projected households from across the region. Unfortunately today, this strategy is beginning to unravel. Recent research by the HBF shows that in total all the adopted and emerging plans for the West Midlands will only provide for 17,085 homes per year compared to the WMRSS target of 19,795 per annum. Such significant reductions in the overall housing provision throughout the region are likely to increase the number of households living in housing stress.

The Table below illustrates the potential reductions in housing provision across Stafford and its neighbouring authorities, which represents approximately 10% of the overall regional under supply when compared to the WMRSS. There are also shortfalls between local plan housing numbers and housing need identified in SHMAs.

<b>Local Authority</b>	<b>SHMA housing numbers per year</b>	<b>Local Plan housing numbers per year</b>	<b>WMRSS housing numbers per year</b>
Staffordshire Moorlands	429 (affordable)	250 (submitted)	250
Stoke on Trent	1571	570 (adopted)	570
East Staffordshire	478	470 (emerging)	650
Stafford	655	500 (emerging)	505
Newcastle under Lyme		285 (adopted)	285
Cannock Chase		265 (emerging)	290
Lichfield		435 (emerging)	400
South Staffordshire		175 (adopted)	175
Telford & Wrekin		1120 (adopted)	1325
Shropshire		1375 (adopted)	1285
<b>TOTAL</b>		<b>5445</b>	<b>5735</b>
<b>SHORTFALL</b>			<b>290</b>



The Council has not sufficiently demonstrated its co-operation with neighbouring authorities. The Council should not assume that just because its neighbours have not drawn attention to any matters of a strategic nature, such strategic pressures do not exist. For example the evidence submitted at the recent Examination in Public (EIP) of the Staffordshire Moorlands plan demonstrated that the housing requirement is a capacity based calculation, the Council has deliberately decided to suppress housing supply in its area in order to support the regeneration of the North Staffordshire regeneration area. The Staffordshire Moorland rationale is that suppression of housing supply within its area will compel households to move to the North Staffordshire regeneration area to live. It is our contention that this is a crude strategy, which is unjustified in terms of the NPPF and the assessment of housing needs by LPAs. The NPPF expects LPAs to conduct an objective assessment of their housing needs through a SHMA. It is clear that Stafford, East Staffordshire and Stoke on Trent Councils have not increased their housing requirements to accommodate the shortfall in supply that will arise from Staffordshire Moorlands.

Of equal regional concern is Birmingham City Council's proposal to reduce its requirement from 57,000 to 50,000 and the very significant reduction from 33,500 to 11,373 proposed by Coventry City Council. Indeed Birmingham's recent core strategy consultation showed that the most recent objective assessment of housing need indicated a requirement for at least 80,000 homes over its new plan period with the Council only able to accommodate 43,000 homes within its own borders. Even though Birmingham City Council is not an immediate neighbour, it is unlikely that Stafford Borough Council will remain entirely immune from the pressures emanating from Birmingham. The interconnected relationship between Birmingham and Stafford is illustrated by the map of Stafford Borough and its Regional Context on page 7 of Stafford Borough Plan. The Council is committed to Stafford as a Growth Point as stated in Paragraph 3.17 of the Plan and re-iterated in Paragraph 6.12. In view of Birmingham's proposals, the Council may wish to consider increasing housing numbers in order to further its ambitions of developing Stafford's sub-regional role.

There is a concern that if neighbouring authorities are not adequately assessing housing needs, these housing pressures could impinge upon Stafford. When the levels of planned housing provision are assessed against the most up to date evidence of need Stafford could be subject to much higher levels of demand for housing. The Council should raise this concern with its neighbouring authorities to ensure that their own needs are addressed without relying upon Stafford to accommodate their unmet needs.

## **Housing**

**Policy SP2** proposes 500 dwelling per year (10,000) over the plan period (2011-2031) plus additional new homes for military personnel. This policy proposal is in line with 2008 based household projections for Stafford. A need for 210 affordable homes per year is identified in Paragraph 11.7.

There is an inconsistency between **Policy SP2** and **Policy Stafford 1 – Stafford Town**. **Policy SP2** states the provision of 500 dwelling per year does not include additional requirements for military housing. This presumption is carried on in the Table in Paragraph 6.54 showing housing land allocation distribution. However **Policy Stafford 1 – Stafford Town** states the provision of 5,500 new homes includes the additional provision for 400 new Service Family Accommodation units for Ministry of Defence personnel. This inconsistency needs to be clarified.

**Policies SP3 and SP4** set out a sustainable settlement hierarchy, whereby 72% of housing land allocations will be in Stafford, 8% in Stone, 12% in key villages and the remaining 12% in the rural area. However in the past development has occurred as follows 78% in Stafford, 17% in Stone and 35% in the rural areas. Therefore market-led demand and the wishes of the Council are not totally aligned, which may reduce housing delivery in the future.

**Policy SP7** establishes settlement boundaries for Stafford and Stone. However settlement boundaries for key villages and the rural areas will be established through Neighbourhood Planning or a site specific allocations and policies document if neighbourhood plans are not forthcoming. This proposal creates uncertainty around key villages and rural areas, where 24% of future housing development is proposed. Neighbourhood Plans may take a long time to prepare and adopt, which could prevent the effective delivery of the plan. The plan should provide greater guidance as to when these Neighbourhood Plans are expected to be adopted. There should be a date by which the site specific allocation document would be prepared.

The Housing Trajectory in Appendix F is consistent with **Policy SP2** indeed in previous years housing delivery has exceeded forecasts. The SHLAA identified insufficient infill sites to deliver the scale of new development required so strategic green-field sites in sustainable locations are also identified. However **Policy Stone 1ii** restricts delivery of the strategic development location west of Stone until after 2021. The same policy also prohibits development that would result in loss of employment land to non-employment uses. These restrictions may impede housing delivery.

### **Viability and deliverability**

Paragraph 173 of NPPF states “pursuing sustainable development requires careful attention to viability and costs in plan making and decision taking. Plans should be deliverable. Therefore the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is not threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable”.

Paragraph 174 of the NPPF continues “LPA should set out their policy on local standards in the local plan including requirements for affordable housing. They should assess the likely cumulative impacts on development in their area of all existing and proposed local standards, supplementary planning documents and policies that support the development plan, when added to nationally required standards. In order to be appropriate, the cumulative impact of these standards and policies should not put implementation of the plan at serious risk and should facilitate development throughout the economic cycle”.

**Policy C2** sets out the Councils requirements for Affordable Housing. This policy is re-iterated in **Policy Stafford 2 – North of Stafford, Policy Stafford 3 – West of Stafford, Policy Stafford 4 – East of Stafford**, where 30% affordable housing provision is required and **Policy Stone 2 – West and South of Stone**, where 40% affordable housing provision is sought. These policies state that if a lower affordable housing figure is advocated, an independent economic viability assessment will be expected from developers.

Unfortunately, the report Economic Viability of Housing Land in Stafford Borough July 2011 by Levvel is out of date. Paragraph 158 of the NPPF requires that Local Planning Authorities (LPA) should ensure that the local plan is based on adequate, up to date and relevant evidence.

There is no evidence that the Viability Report adequately took into account the cost implications of all policies now contained in the Plan, for example :-

- **Policy I1 Infrastructure Delivery Policy.** The appropriate levels of contributions for infrastructure will be secured in a variety of ways, including the CIL charging schedule, Section 106 agreements and legal agreements to ensure new developments contribute to new and /or improved infrastructure and services (including community needs) ;
- **Policy Stafford 2 – North of Stafford, Policy Stafford 3 – West, Policy Stafford 4 – East, and Policy Stone 2 – West & South.** Developer contributions will be required to provide the strategic infrastructure needed to achieve a comprehensive sustainable development at these Strategic Development Locations ;
- **Policy T1b.** All new developments to produce Transport Assessments and Travel Plans
- **Policy N1c.** New developments will comply with Building for Life 12 principles ;
- **Policy N1I.** New developments will comply with Secured by Design principles ;
- **Policy N2 Sustainable Construction.** Paragraph 12.17 states that new housing developments will be required to provide a Code for Sustainable Homes certification. This requirement is over and above

the Governments Zero Carbon Homes Policy implemented through Part L of the Building Regulations ;

- Paragraph 7.4 refers to Lifetime Homes standards.

Moreover the Viability Report uses BICS costs as at Q2 2010. Since 2010 more information has become available on costs such as :-

- DCLG Cost of Building to Code for Sustainable Homes (CfSH) Updated Cost Review 2011 which shows the cost of building to Code 5 represents an increase of 28-31% on build costs dependant on nature of site and its location ;
- The DCLG Assessing the Cost of Lifetime Homes Standards July 2012 which shows the average additional cost for complying with the 12 criterion relating to internal specification is £1,525. The Viability Report only uses a figure of £600 per unit for its modelling purposes. Paragraph 3.43 of the report states “it should be noted that a cost significantly in excess of £600 per unit will impact on the overall viability of a scheme and its ability to deliver affordable housing”.

When the above mentioned additional costs are added into viability appraisals, the majority of sites will become unviable and housing delivery will be jeopardised. The proposed provision of affordable housing in **Policy C2** and other associated policies are not proven. It is the Council’s responsibility under Paragraph 174 of NPPF to properly assess viability.

Moreover it is not appropriate for the Council to set as policy obligations the use of best practise guidelines, which were designed for voluntary rather than mandatory use, for example :-

- **Policy N1c.** New developments will comply with Building for Life 12 principles ;
- **Policy N1I.** New developments will comply with Secured by Design principles.

Secured by Design and Building for Life 12 have contradictory aims, which makes these two sets of guidelines incompatible. The Council should consider deletion of these policy obligations.

Likewise it is inappropriate in **Policy N2** Sustainable Construction for the Council to outperform national standards by requiring CfSH certification. Under the Government’s Zero Homes Policy only compliance with Part L of Building Regulations is mandatory, which deals with energy efficiency. This is just one component of the nine categories in the CfSH.

## Conclusion

The Stafford Borough Plan should be found unsound because :-

- Its policies have not been **justified** with an up to date, robust and credible evidence base, the assumptions used are not always reasonable and the choices made are not backed by facts ;
- The plan will not be **effective** because it is not deliverable. There are no coherent strategies with neighbouring authorities, viability studies are unreliable and there is insufficient flexibility within the plan.
- Its policies are not always consistent with NPPF.

Of particular concern are :-

- A failure to fully satisfy obligations under the duty to co-operate ;
- The under provision of housing supply dependant on the inclusion / exclusion of military homes ;
- An unviable affordable housing policy ;
- Proposals to outperform implementation of national standards of design and sustainable construction without due regard for cost implications on viability.

Yours faithfully

For and on behalf of **HBF**



**Susan E Green MRTPI**  
**Planning Manager – Local Plans**

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## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Staffordshire Wildlife Trust (Miss Kate Dewey)
Comment ID	PS377
Response Date	28/02/13 11:52
Consultation Point	10 POLICY STAFFORD 3 ? WEST OF STAFFORD ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

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Parts of the site allocated for housing are in the floodplain, contrary to national policy and other policies in this plan. Protection of Burleyfields Biodiversity Alert Site within the policy is welcomed, but in the Stafford West Concept Diagram does not appear to be protected, as it is covered by housing allocation. Part of the site has already been destroyed by recent development, and converted into public open space.

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Alteration of plans to be consistent with policies for this area.

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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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Taylor Wimpey/Bellway ( )
Comment ID	PS378
Response Date	28/02/13 11:53
Consultation Point	19 Appendix D- Infrastructure ( <a href="#">View</a> )
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 Local Plan Strategy is Legally compliant?** Yes

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Staffordshire County Council's *Transport Evidence to Support a Western Direction of Growth* concludes that 'Section C of the Western Access Route between Martin Drive, Castlefields, and Doxey Road to provide a second means of access to the Castlefields and Burleyfields, together with an agreed package of sustainable transport interventions' enables the delivery of the full urban extension. However, Appendix D lists all of the SWA under Stafford West which appears to suggest the whole route is required, when clearly the evidence states it is not. The SWA delivers wider benefits to the town and town centre.

The table states that 400 homes can be developed prior to the link being delivered. The SCC report demonstrates that 400 homes can be accommodated ahead of the link. However, higher levels have not been tested and therefore it may be possible to deliver more homes ahead of the link.



A detailed site specific transport assessment through the development management process will determine the detailed impacts arising from development and hence the appropriate level of contribution which is necessary and reasonable from the development.

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Under requirements delete "Western Access...in five sections:"; amend "2" to say ?contributions to facilitate delivery of the link from Martin Drive to Doxey Road (adjacent railway line);?

Under headings Requirements, Phasing and Capital Cost delete all text from "3" onwards

Under Funding delete all text from "1. SDL developer" onwards

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**If you wish to participate at the Examination in Public, please outline why you consider this to be necessary**

Taylor Wimpey and Bellway have major interests in land to the West of Stafford. The plan has significant implications for their interests and business plans.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Taylor Wimpey/Bellway ( )
Comment ID	PS379
Response Date	28/02/13 11:56
Consultation Point	19 Appendix D- Infrastructure ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.2

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**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

In relation to nature conservation, there is a need to make clear that contributions are only required from within Zone of Influence, except large developments that need to be screened individually.

**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.**

In relation to nature conservation, there is a need to make clear that contributions are only required from within Zone of Influence, except large developments that need to be screened individually.

*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

**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**

Taylor Wimpey and Bellway have major interests in land to the West of Stafford. The plan has significant implications for their interests and business plans.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Staffordshire Wildlife Trust (Miss Kate Dewey)
Comment ID	PS380
Response Date	28/02/13 11:56
Consultation Point	7.32 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Justified  
. Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Allocations of housing and employment have not been planned with the benefit of up to date information on local wildlife sites or ecological networks in the area, and make no reference to the borough Green infrastructure Strategy or Staffordshire Biodiversity Action Plan. Areas for allocation are known to support protected species, and some additional areas may be of Local Wildlife Site status, but have not been fully surveyed, as the Ecological Desk study raised issues but did not involve on the ground surveys of all sites proposed for allocation. New green infrastructure areas do not appear to be large enough to mitigate habitat/ species losses, and there is little or no GI proposed in mixed-use areas

**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.**

Concept plans to be based on up to date environmental information

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Taylor Wimpey/Bellway ( )
Comment ID	PS381
Response Date	28/02/13 11:56
Consultation Point	10 POLICY STAFFORD 3 ? WEST OF STAFFORD ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The area West of Stafford includes previously developed land (part of which has been granted planning permission) and land allocated for residential development (site HP9) in the Adopted Local Plan. Developers and landowners West of Stafford are working on a concept plan for the area, to be followed by a masterplan. However, the absence of such a masterplan should not prevent the granting of planning permission for applications which constitute sustainable development provided it does not prejudice the ability to deliver the wider allocation. The wording at present is inconsistent with Spatial Principle 1 and the NPPF both of which set out a positive approach to facilitating development.

**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.**

delete 2 nd sentence.

Add new supporting text:

*The area West of Stafford includes previously developed land, two parcels of land on which planning permission has already been granted, and land allocated for residential development (site HP9) in the Adopted Local Plan. Developers and landowners West of Stafford are working with the Councils, statutory bodies and local stakeholders to prepare a masterplan for the area. Applications within the strategic development location, ahead of an agreed masterplan, will be permitted provided they constitute sustainable development provided and would not prejudice the ability to deliver the wider allocation.*

*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

**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**

Taylor Wimpey and Bellway have major interests in land to the West of Stafford. The plan has significant implications for their interests and business plans.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Staffordshire Wildlife Trust (Miss Kate Dewey)
Comment ID	PS382
Response Date	28/02/13 11:59
Consultation Point	7.36 Paragraph ( <a href="#">View</a> )
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Allocations of housing and employment have not been planned with the benefit of up to date information on local wildlife sites or ecological networks in the area, and make no reference to the borough Green infrastructure Strategy or Staffordshire Biodiversity Action Plan. Areas for allocation are known to support protected species, and some additional areas may be of Local Wildlife Site status, but have not been fully surveyed, as the Ecological Desk study raised issues but did not involve on the ground surveys of all sites proposed for allocation. New green infrastructure areas do not appear to be large enough to mitigate habitat/ species losses.

There is no GI proposed for the employment area.



**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.**

Plans based on up to date ecological information and consistent with borough GI strategy, Biodiversity Action plan and Staffordshire BAP

*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



**The Plan for Stafford Borough  
Pre-Submission Consultation**

Ref:

**Representations Form**

**(For official  
use only)**

**Please return completed forms to:**

- Head of Planning & Regeneration, Stafford Borough Council, Civic Centre, Riverside, Stafford, ST16 3AQ
- or by email to [forwardplanning@staffordbc.gov.uk](mailto:forwardplanning@staffordbc.gov.uk)
- or by fax to: 01785 619473

**Responses must be received by 12 noon on Thursday 28<sup>th</sup> February 2013**

**This form has two parts:**

**Part A:** Personal Details

**Part B:** Your representations.

- Please complete Part B of this form for each representation you wish to make. You do not need to complete Part A more than once, but please ensure you state your name or organisation as applicable at the top of each Part B form you submit.
- Please refer to the attached guidance notes on making representations so that they address issues of legal compliance and / or soundness.
- Please note that when representations are submitted only Part B of the form will be published. Contact details on Part A will not be published.

# Part A

## I. Personal Details\*

\*If an agent is appointed please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

## 2. Agent's Details (if applicable)

Title	Mrs	
First Name	Amanda	
Last Name	Smith	
Job Title (if applicable)	Planner	
Organisation (if applicable)	English Heritage	
Address Line 1	The Axis	
Address Line 2	10 Holliday Street	
Address Line 3	Birmingham	
Address Line 4		
Postcode	BI ITG	
Telephone Number	0121 6256851	
E-mail address	amanda.smith@english-heritage.org.uk	

## Part B – Please use a separate sheet for each representation

Name or Organisation	English Heritage
----------------------	------------------

### 3. What part of The Plan for Stafford Borough (including the Policies Maps document) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	Policy Stafford 3 – West of Stafford
---	--------------------------------------

If your comment does not relate to a specific part of the document, or it relates to a different document, for example the Sustainability Appraisal, please make this clear in your response.

### 4. Do you consider that the Plan for Stafford Borough is:

- a. **Legally compliant\*?**  
Yes  No
- b. **Sound\*?**  
Yes  No

To check a box when completing this form electronically, double click on it and select 'checked' under default value.

\*Please refer to the attached note for guidance on legal requirements and soundness.

If you have entered **No** to Q4.b. please continue to Q5. In all other circumstances please go to Q6.

### 5. Do you consider The Plan for Stafford Borough is unsound because it is not:

- a. **Positively Prepared**
- b. **Justified**
- c. **Effective**
- d. **Consistent with national policy**

### 6. Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.

#### Policy Stafford 3 – West of Stafford

In previous representations on the emerging Plan English Heritage has expressed concern at the scale and extent of development proposed for the strategic allocation West of Stafford due to its impact on the setting and significance of Stafford Castle, a scheduled monument and designated heritage asset.

English Heritage is of the view that the scale and extent of the proposed strategic allocation does not represent sustainable development as it is inconsistent with the principles and policies of the Framework on conserving and enhancing the historic environment and heritage assets (NPPF 151).

The National Planning Policy Framework (NPPF) reaffirms that the protection and enhancement of the historic environment is a key dimension of sustainable development (NPPF 6 & 7). The Framework requires that to achieve sustainable development economic, social and environmental gains should be sought jointly and simultaneously (NPPF 8). Pursuing sustainable development also involves seeking improvements in the quality of the historic environment (NPPF 9). Moreover, the presumption in favour of sustainable development allows for the development needs of an area to be met unless specific policies indicate development should be restricted, such as protecting designated heritage assets (NPPF 14).

Whilst English Heritage does not object in principle to some development to the west of Stafford, we do not support the extent of the proposed allocation as shown in the allocation diagram (page 54) and the distribution of land uses on the accompanying concept diagram (page 55). This is principally because of the harm the proximity of such development is likely to have on the significance of the Stafford Castle, by virtue of its location within the immediate setting of the designated area.

Great weight should be given to the conservation of designated assets, and any harm or loss of significance requires clear and convincing justification (NPPF 132). We do not consider the supporting Sustainability Appraisal appropriately considers the policy and the associated strategic allocation. We disagree with the summary findings of the appraisal for this policy as '*uncertain, depends on implementation*' in relation to the sustainability objective on the historic environment (objective 15). We also consider that a more in-depth analysis is warranted due to the site specific nature of the allocation and its potential impact on the significance of Stafford Castle. The evidence base for the Plan includes a Historic Environment Assessment of Stafford Town (Appendix A). This is a strategic level assessment and utilises information from the County Council Historic Environment Record and the County's Historic Landscape Characterisation. The results of this assessment are not directly referred to in the sustainability appraisal.

In June 2012 English Heritage was invited by Stafford Borough Council to join the Environment Group for the 'Burleyfields Land west of Stafford' scheme. In conjunction with Staffordshire County Council and Stafford Borough Council, we requested an up-to-date evidence base on the historic environment in order to understand the potential impact of the scheme on the significance of heritage assets in this area, including the setting and significance of Stafford Castle. This request reflected our outstanding representations on the emerging local plan (Draft Publication October 2011; Strategic Policy Choices July 2012).

A detailed Historic Environment Assessment for the proposed allocation at Burleyfields has been prepared on behalf of the Burleyfields Consortium. This was submitted as draft to English Heritage at the end of January 2013. Whilst English Heritage welcomes the preparation of the report, it is still subject to review and agreement by English Heritage, Staffordshire County Council and Stafford Borough Council.

(attach separate sheets as necessary)

- 7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough legally compliant or sound, having regard to the test you have identified at question 5. You will need to say why this change will make the document legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

English Heritage recommends that the extent of the strategic allocation is reduced to avoid harm to the setting of Stafford Castle and its significance. We also recommend that the accompanying concept plan is amended to reflect how the setting of the Castle will be protected and enhanced through the layout of the development as set out in Policy Stafford 3 – West of Stafford (Environment ix).

We welcome the opportunity to continue to liaise with the Borough Council on how our representation can be addressed.

(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**

English Heritage wishes to reserve its position on participating at the Examination in Public subject to further discussions with the Borough Council with regard to our representation.

(attach separate sheets as necessary)

**Please note** the Planning Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the Examination in Public

**Please ensure you have printed your name or organisation at the top of this form**

## **Representation Form Guidance Notes**



Representations made within the consultation period will be considered alongside The Plan for Stafford Borough: Submission as part of an examination by an independent planning inspector. The purpose of the examination is to establish whether the plan has been prepared in accordance with **legal requirements**, and whether it is **sound**.

### **Representations should therefore focus on legal compliance and soundness.**

If you wish to make a comment seeking to change The Plan for Stafford Borough you should make clear in what way you consider it is not legally compliant or sound. You should try to support your comment by providing evidence and supporting information showing why it should be changed. It will be helpful if you also say precisely how you think it should be changed.

For the plan to be **legally compliant** it must:

- be prepared in accordance with:
  - the Council's Local Development Scheme (a timetable for plan preparation);
  - the Council's Statement of Community Involvement (which includes the Council's policy for community engagement on The Plan for Stafford Borough) and
  - relevant Acts and Regulations; in particular the Town and County Planning (Local Planning) (England) Regulations 2012;
- have been subject to sustainability appraisal;
- have regard to:
  - national policies, advice and guidance issued by the Secretary of State; and
  - the Stafford Borough Sustainable Community Strategy and Stafford Borough Community Action Plan;
- be in general conformity with the Regional Spatial Strategy for the West Midlands;
- meet legal requirements under the Duty to Co-operate (introduced via the Localism Act 2011).

**Soundness** is explained in the National Planning Policy Framework. For a plan to be sound it must be:

- **Positively prepared** - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements;
- **Justified** – the plan should be the most appropriate strategy based on a robust and credible evidence base;
- **Effective** – the plan should be deliverable over its period;
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

Where there are groups who share a common view on how they wish to see The Plan for Stafford Borough changed, it would be very helpful for that group to send a single comment rather than for a large number of individuals to send in separate comments which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.



# GNOSALL PARISH COUNCIL

(INCLUDING THE WARDS OF MORETON AND KNIGHTLEY)

Clerk of the Council:  
Miss J Cooper  
The Grosvenor Centre, High Street,  
Gnosall, Stafford ST20 0EX



Tel: 01785 822685  
E-mail:  
[clerk@gnosallparishcouncil.org.uk](mailto:clerk@gnosallparishcouncil.org.uk)  
[www.gnosallparishcouncil.org.uk](http://www.gnosallparishcouncil.org.uk)

26 February 2013

Alex Yendole  
Forward Planning Dept  
Stafford Borough Council  
Civic Offices  
Riverside  
STAFFORD

Dear Alex,

## **THE DRAFT PLAN FOR STAFFORD BOROUGH - CONSULTATION 2013**

Gnosall Parish Council held a public meeting on Monday 25<sup>th</sup> February 2013 attended by approximately 50 residents, 9 parish councillors and 1 Stafford Borough Councillor to inform parishioners of the Local Plan, how it would affect Gnosall and advise how to respond. Gnosall Parish Council had invited Cllr Mike Smith, one of the local borough councillors to help answer questions residents raised.

The main concern from both councillors and residents is that the residential development boundaries of key service villages will no longer be in place for a period of time whilst new boundaries are established. This would enable developers and those with land wanting to sell for housing, to proceed with development. Gnosall Parish Council has already written to Stafford Borough Council expressing its intent to have a Neighbourhood Plan and asking that the current Residential Development Boundary remains in place during the period that the Neighbourhood Plan is created. **I would welcome a response to this question as a matter of urgency**

As far as specifics are concerned:

### Is the Plan Justified?

Gnosall is one of 11 key service villages; it was accepted that it is one of the largest of these villages with many facilities and amenities therefore it seemed inevitable that Gnosall would be allocated a larger proportion of the 629 houses to be allocated over the next 20 years. However, there were serious concerns raised about the state of the highways and whether any additional infrastructure would be built to accommodate the extra traffic and alleviate the problems that already exist on the A518 that would only be made worse. There are already very serious traffic problems between Gnosall and Stafford and it was interesting to hear that many residents choose to travel to



Newport and Telford to shop rather than face the traffic problems getting into Stafford.

Is the Plan effective?

1. What about flooding problems – would this have an impact on the amount of houses that could be built?
2. 20 years is a long time and demographics change rapidly, especially with the proposed MOD influx. What guarantees are there in place that in ten or twelve years time the Borough will not suddenly decide that they have underestimated and another thousand homes are required? As Stafford and Stone would be saturated, these would presumably have to go into rural areas.

Is the Plan Consistent?

1. What happens if 629 houses are complete before the end of the 20 year time frame?
2. What happens if each of the 11 key service villages has a Neighbourhood Plan adopted and the total does not add up to 629 houses?

In addition to the main issues raised about boundaries and Neighbourhood Planning, other issues raised from residents were:

1. How will be 629 houses be allocated amongst the key service villages?
2. The map that shows potential site for wind turbines - this may cause housing blight in these areas
3. Could the Local Plan include a requirement that all new housing should to be built with solar panels?

Please acknowledge receipt of the above comments.

Yours sincerely

*Jayne Cooper*

**Jayne Cooper**  
**Clerk, Gnosall Parish Council**



## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	M Hughes
Comment ID	PS385
Response Date	28/02/13 02:41
Consultation Point	The Plan for Stafford Borough - Publication ( <a href="#">View</a> )
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 Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The time scale is unrealistic and there are no guarantees. It is set over 20 years. Demographics change rapidly these days and particularly in this area with the apparent influx of MOD personnel, it is even more difficult to judge. There appears to be no guarantee that these numbers of homes to be built are set in stone and that in ten to twelve years the then Council will not say Sorry, we underestimated, we need another 1000 homes. By this time Stafford and Stone will be saturated and the Council will want to dump them in the countryside.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Environment Agency ( Unknown)
Comment ID	PS386
Response Date	28/02/13 11:55
Consultation Point	4 Key Issues ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

We welcome the acknowledgement of the impact of climate change on flood risk and drainage issues, but consider that the likelihood of drought should also be referenced. Climate change could result in an increase in water scarcity so measures to reduce demand and encourage the efficient use of water are important.

## Comments

### **The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)**

<b>Comment by</b>	Environment Agency ( Unknown)
<b>Comment ID</b>	PS387
<b>Response Date</b>	28/02/13 11:55
<b>Consultation Point</b>	5 Spatial Vision and Key Objectives ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	0.3

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The creation of new green infrastructure is only mentioned for villages, and should be corrected to ensure this is a requirement for growth in urban areas too.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Environment Agency ( Unknown)
Comment ID	PS388
Response Date	28/02/13 11:55
Consultation Point	5 Spatial Vision and Key Objectives ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

It is noted that it is not a key objective for Stone to avoid development in flood risk areas. Given the extent of River Trent floodplain affecting Stone Town centre in particular, we recommend this objective is extended to Stone as well as Stafford. Given the importance of rivers and flooding to Stafford, the Stafford Town Key Diagram should be revised to identify the significant rivers and their locations within the town.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Environment Agency ( Unknown)
Comment ID	PS389
Response Date	28/02/13 11:55
Consultation Point	8 POLICY STAFFORD 1 ? STAFFORD TOWN ( <a href="#">View</a> )
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 Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

*We recommend that under the heading Environment, an additional point is added to state: ?Ensuring that the development does not harm but enhances any watercourse in the town'.*

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Environment Agency ( Unknown)
Comment ID	PS390
Response Date	28/02/13 11:55
Consultation Point	9 POLICY STAFFORD 2 ? NORTH OF STAFFORD ( <a href="#">View</a> )
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 Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The Environment Agency proposes that point iv) of this policy could be better reworded to make it simpler. *'A comprehensive drainage scheme will be delivered to enable development of the Strategic Development location which will include measures to alleviate flooding downstream on the Marston Brook and Sandyford Brook.'* As elaborated upon in section xvi) there are two strands to the reduction of flood risk downstream at this location - the reduction of run-off rate to below greenfield and the potential for an open water storage solution. It is felt that both these issues are encompassed within the proposed wording. Flood risk alleviation proposals are currently being assessed to ascertain how much downstream benefit the SDL can realistically deliver. The outcomes of these discussions may trigger the refining of the wording relating to flood risk (points iv) and xvi), however we consider that given the current understanding of the options available, this policy is worded suitably to cover all likely outcomes. Given the significance of the Sandyford and Marston Brook in relation to this SDL, we recommend that you consider amending the Stafford North Concept Diagram to identify the location of the waterbodies, areas at risk of flooding downstream and an indicative location of the potential alleviation area.



## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Environment Agency ( Unknown)
Comment ID	PS391
Response Date	28/02/13 11:55
Consultation Point	10 POLICY STAFFORD 3 ? WEST OF STAFFORD ( <a href="#">View</a> )
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 Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Paragraph 7.29 should acknowledge the floodplain that affects this site, and 7.31 should potentially clarify how this will be managed within the development layout, potentially affecting access. Both Floodzone 2 and 3 should be identified within the Concept Diagram for the SDL. Given the policy also references the downstream watercourses which will be impacted by the development, it may be of use to identify these on the Concept Diagram. As per the comments relating to Policy Stafford 2, we recommend point vii) is revised to read as follows. *'A comprehensive drainage scheme will be delivered to enable development of the Strategic Development location which will include measures to alleviate flooding downstream on the Doxey brook and tributaries to the River Sow.'* Point xii) of the policy does not refer to the culverted watercourses which cross the site, and this should be amended in line with Policy N4: J: iv).

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Environment Agency ( Unknown)
Comment ID	PS392
Response Date	28/02/13 11:55
Consultation Point	11 POLICY STAFFORD 4 ? EAST OF STAFFORD ( <a href="#">View</a> )
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 Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

As per the comments relating to the other SDLs within Stafford, we recommend point viii) is revised to read as follows. *'A comprehensive drainage scheme will be delivered to enable development of the Strategic Development location which will include measures to alleviate flooding downstream on the River Sow.'* It may be worthwhile particularly for Stafford Policies 3 and 4 to add supporting text to allude to the type of flood alleviation which this policy refers to, presumably reduction of surface runoff to less than greenfield rates as recommended within your Level 2 Surface Water Management Plan. Stafford Policy 2 includes specific reference to this under infrastructure requirement, in point xvi).

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Environment Agency ( Unknown)
Comment ID	PS393
Response Date	28/02/13 11:55
Consultation Point	12 POLICY STONE 1 ? STONE TOWN ( <a href="#">View</a> )
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 Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Para 8.8 should be amended to read *'due to flood risk implications'* as it currently reads as if this relates to water supply. Your Authority should be aware that our floodmap for this location is likely to change. If this occurs prior to examination, the Strategic Flood Risk Assessment should be updated accordingly.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Environment Agency ( Unknown)
Comment ID	PS394
Response Date	28/02/13 11:55
Consultation Point	31 Policy N1 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

We advise an additional bullet point is added within the Space section to ensure that space should be made for water within the development layout. This is key if the push for SuDS within the document is to be implemented on the ground.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Environment Agency ( Unknown)
Comment ID	PS395
Response Date	28/02/13 11:55
Consultation Point	32 Policy N2 ( <a href="#">View</a> )
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 Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Bullet point 1 under Sustainable Drainage should add the caveat that infiltration drainage should not be encouraged where underlying contamination is known to be present in the ground. Having reviewed the closing paragraph under the Sustainable Drainage section of this policy, we recommend it is reworded. This should provide a link to Water Framework Directive (WFD), and remove the caveat regarding mitigation measures, as it is felt it is unnecessary. If the measures can avoid the adverse impacts then the development will not lead to degradation of the water environment. We therefore put forward the following wording: *'Any development that could lead to the degradation of the WFD status of the waterbody should not be permitted'*. In addition, the implementation of this policy could be aided through the requirement for developers to submit a water management statement as part of their development proposals which addresses the issues raised here. This links to our comments on policy N4 relating to the submission of water evidence by developers. This additional requirement could be added into the first sentence to read *'All new development must provide adequate arrangements for the disposal of foul sewage, trade effluent and surface water to prevent risk of pollution, by publishing a water management statement'*. We question the inclusion of the reference to 'standing' water bodies within this paragraph, should it refer to 'surface' water bodies? The Local Authority should work constructively alongside the Waste Planning Authority (WPA) to ensure waste management is considered alongside other spatial planning objectives. The timing and phasing of development should be synchronised with the delivery of appropriately located modern and sustainable waste management infrastructure that meets the needs of the local community. Opportunities to integrate waste management into proposed new development should be considered. This is addressed to some extent in Policy N2, but there is scope to expand on this to develop the policy further. It is also important that the local planning authority consider the impact of proposed non-waste developments and existing waste management facilities and allocations. Development should not prejudice the waste management strategy set out in the local plan. The WPA should be consulted in this respect. This will help to ensure

sustainable economic growth that does not leave a damaging environmental legacy. Services provided should encourage and enable communities to follow the waste hierarchy - reduce, re-use, recycle, recover, with landfill as the last resort. Waste minimisation and resource efficiency should be at the heart of all new development. The design of buildings and supporting infrastructure should consider their future repair and eventual demolition in the selection of construction mechanisms and materials ('cradle-to-cradle' design). Again, this has been addressed in Policy N2 and the requirement to meet a CSH or BREEAM rating, and the need for site waste management plans will contribute towards achieving this. We draw your attention to page 246 of your Outline Water Cycle Study, headed Demand Management which states that *'more stringent management than Level 3 of the Code for Sustainable Homes should be investigated and adopted wherever feasible'*.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Environment Agency ( Unknown)
Comment ID	PS396
Response Date	28/02/13 11:55
Consultation Point	34 Policy N4 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

It has been acknowledged that investment will be required by Severn Trent Water with regard to all forms of the sewerage infrastructure it owns which may lead to time delays in gaining the funding and delivering the improvements. As a result of this requirement, there must be available capacity within the sewerage infrastructure (foul sewerage network and receiving sewage treatment works) in order to accommodate this flow BEFORE any development is occupied. Discussions should be continued with Severn Trent Water and development should be aligned with the necessary improvements to the sewerage infrastructure. Hydraulic modelling should be carried out for all developments. To aid implementation, there should be a reference to this within the policy. It may be appropriate to add a point within point J to state that evidence should be provided by developers to demonstrate that there is adequate sewerage infrastructure already in place, or that it will be in place prior to occupation of the scheme. Development should not cause any deterioration either directly or indirectly to water quality and should not prevent a waterbody from achieving 'Good Ecological Status / Potential' under the Water Framework Directive. We welcome the reference to the Biodiversity Duty within paragraph 12.27. We question whether Point F of this policy should first state that the presumption will be against any new development where damage is unavoidable, prior to considering mitigation and compensation proposals. It should be noted that under the WFD, the impacts of the development may still be unacceptable regardless of mitigation measures. We strongly support the requirement of Point J, and consider that this could be strengthened by adding '*have suffered from past loss and degradation*' under point G to allude again to culverted and man-made channels. Fish is a failing element under the WFD in this borough and fish walkover surveys have identified barriers to their movement. This could be remedied by the addition of the following point to the policy, possibly within Point J (as it relates to WFD) or as a standalone issue: '*Where possible, try and overcome barriers to fish by supporting the construction of fish passes or removing barriers*'.

## Comments

### **The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)**

<b>Comment by</b>	Environment Agency ( Unknown)
<b>Comment ID</b>	PS397
<b>Response Date</b>	28/02/13 11:55
<b>Consultation Point</b>	15 Glossary ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	0.3

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Water Framework Directive (WFD) should be included in the Glossary.



## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Environment Agency ( Unknown)
Comment ID	PS398
Response Date	28/02/13 11:55
Consultation Point	16 Appendix A - Local Plan Evidence Base ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3
Files	<a href="#">PS 398 attachment.docx</a>

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

As raised in our response of 28 January 2011 in response to your Local Choices Consultation, the River Basin Management Plans are the local delivery vehicle for the WFD, and should form a key element of your evidence base. The majority of your borough falls within the Humber RBMP, (a small minority of the land to the west of the borough draining to the Severn RBMP. In light of this the RBMPs should be included within your evidence base. The Environment Agency are currently refining this work to identify the causes of failure for all waterbodies, and to identify actions for all partners to help rectify these issues. As such, more detailed information will become available over time. In order to ensure your plan has the flexibility to implement any actions that may be identified as being implemented via the planning process, we continue to recommend that a broader policy reference is added to ensure that all development proposals pay due regard to the requirements of the local RBMP and will not pose an obstacle to the meeting of its targets (see comment relating to Policy N4). We draw your attention towards our advice note for LPAs, which provides guidance on how WFD can be implemented across all your functions. We have referred to section 2.3.5 in assessing and commenting on your policies and proposals. We request this is circulated to relevant colleagues identified within the note as their role having the potential to manage WFD.

<https://publications.environment-agency.gov.uk/skeleton/publications/ViewPublication.aspx?id=4e8c5eee-9804-4571-b911-70db8b9af063>  
Below is a summary of information taken from this plan, identifying the surface waterbodies that flow within your boundary. This shows that only one of your surface waterbodies is currently at the required Good Status and all other waterbodies need improving. It must be ensured that the waterbody currently at Good Status does not decline in quality.



Waterbody ID	NAME	Class	Failing Element
GB104028053220	Scotch Brook Catchment (trib of Trent)	Poor	Fish
GB104028053271	River Trent from Fowlea Brook to Tittensor	Moderate	Fish, Invertebrae
GB104028053272	River Trent from Tittensor to River Sow	Poor	Diatoms, Fish, P, Inverts, Annex 8, Ammonia
GB104028053280	Park Brook Catchment (trib of Trent)	Moderate	No data
GB104028053340	Lyme Brook Catchment (trib of Trent)	Bad	Fish, Invertebrae
GB104028047160	Clanford Brook from Source to Doxey Brook	Moderate	P
GB104028047190	River Sow from R Penk to R Trent	Moderate	P, Fish, Annex 10
GB104028047200	Gamesley Brook Catchment (trib of Sow)	Moderate	P
GB104028047120	River Penk from Saredon Brook to River Sow	Moderate	P
GB104028047130	Doxey Brook from Source to Clanford Brook	Moderate	P
GB104028047140	Doxey Brook from Clanford Brook for River Sow	Moderate	P
GB104028053160	Gayton Brook Catchment (trib of Trent)	Moderate	Fish, P
GB104028047220	River Sow from Brockton Brook to Meece Brook	Moderate	P, DO, Diatoms, Fish
GB104028047300	River Trent from River Sow to Moreton Brook	Poor	Diatoms, Fish, P, Invertebrates, Annex 8, Ammonia
GB104028047380	Moreton Brook from Source to River Trent	Moderate	P
GB104028047430	Amerton Brook Catchment (trib of Trent)	Moderate	No data
GB104028046770	Whiston Brook from Source to Church Eaton Brook	Poor	P, diatoms, Invertebrae
GB104028046780	Church Eaton Brook from Source to Whiston Brook	Moderate	P, invertebrae
GB104028046790	River Sow from Meece Brook to River Penk	Poor	P, Fish, Diatoms
GB104028052990	River Sow from Source to Brockton Brook	Moderate	P, DO
GB104028053000	Brockton Brook from Source to R Sow	Moderate	P, DO
GB104028053010	Meece Brook from Chatcull Brook to R Sow	Poor	P, Fish, Diatoms
GB104028052290	River Blithe from Source to Tad Brook	Good	Good status
GB104028053050	Chatcull Brook from Source to Meece Brook	Moderate	P
GB104028053080	Meece Brook from Source to Chatcull Brook	Moderate	P, Fish

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Inland Waterways Association Stoke on Trent Branch (Dr Robert Luscombe)
Comment ID	PS399
Response Date	27/02/13 17:50
Consultation Point	12 POLICY STONE 1 ? STONE TOWN ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Positively prepared

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Policy Stone 1 - Stone Town: Sections 8.8 Environment; 8.13 and 8.14 Stone Town centre Section 8.6 of the Stone Town Plan rightly highlights the important recreational areas including the much valued Trent & Mersey Canal providing an excellent leisure facility for boaters, walkers and cyclists. The plan stresses the importance of the river and canal corridor with access to open countryside etc. However the plan for Westbridge Park referred to in section 8.6 and documented separately on your website under 'Consultation About Leisure and Recreation facilities in Stone' identifies the Park area adjoining the canal as a site for a retail food store as identified in original plan under sections 8.13 and 8.14. This will further create the effect of a 'concrete tunnel effect' through Stone and detract from the heritage and beauty of the town itself. Currently this stretch of canal is a pleasant area for boaters, cyclists and walkers to view both the canal and open country side, something of a rarity so close to the centre of the town itself. The positioning of a retail food store will seriously detract from the canal

amenity. Furthermore, given that the rear of the store is likely to face the canal, instead of a pleasant country scene where boaters currently moor and explore the town, there will be the sight of loading bays with lorries creating noise and pollution at all times of the day and night. This will inevitably mean that boaters will be discouraged from mooring in the area and given the scarcity of alternative moorings in the town, boaters will instead take their spending power elsewhere.

**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.**

If a retail food store is required for the town and also the provision of improved leisure facilities are dependent on such then alternative sites should be identified as for example, those given in the Trent Vision Trust proposal. Whilst I would not wish to comment on the specifics of TVT proposals, it would seem that alternative sites are potentially available thus protecting and allowing the enhancement of the canal side through Stone to meet the declared intentions of the Plan for Stafford Borough in relation to Stone Town

*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

**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 Inspector may not be familiar with the popularity and use of canal boat moorings and usage in the Stone area (as part of an important 'cruising ring') and may wish to seek further clarification or information relevant to this issue.

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	G EDWARDS and HASZARD FAMILY ( )
<b>Comment ID</b>	PS400
<b>Response Date</b>	09/02/13 11:15
<b>Consultation Point</b>	The Plan for Stafford Borough - Publication (pre-submission) ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Justified
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

In our Response to Spatial Principle SP2 (Stafford Borough Housing and Employment Requirements) we reasoned that the dwelling requirement should be increased from 500 dwgs.p.a. up to 550 dwgs.p.a. Following our reasoning would mean that the total dwelling requirement for Stafford Town, 7,200, should be increased by 10% on a pro-rata basis to 7,920 and that the new dwelling provision in Stafford Town, shown in the Table at 5,560 would need to be increased by 10% on a pro rata basis i.e. to 6,116 new dwellings.

**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.**

Increase the total new dwelling requirements for Stafford Town by 10%, from 7,200 new dwellings up to at least 7,920. Increase the new dwelling provision for Stafford Town by 10% from 5,560 up to at least 6,116.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	G EDWARDS and HASZARD FAMILY ( )
Comment ID	PS401
Response Date	28/02/13 11:15
Consultation Point	2 SPATIAL PRINCIPLE 2 (SP2) ? STAFFORD BOROUGH HOUSING & EMPLOYMENT REQUIREMENTS ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Justified
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

We consider that the dwelling provision set for the Borough at 500 dwgs. p.a. is too low. The Examination in Public, held as part of the Regional Spatial Strategy, implied that the figure of 11,000 new homes for the Borough would be able to be delivered without impacting on neighbouring authorities, instead of the 10,000 p.a. postulated. This would translate into approximately 550 homes p.a. instead of the 500 p.a. postulated in **SP2** . Our reasoned justification for this is as follows:-

- . As far as we are aware "Growth Point" status is still supported by the Borough Council.
- . National Planning Policy Framework (NPPF) states that there should be a significant increase in the delivery of new homes.



- . Dwelling completion rates in the Borough have increased significantly in the last 2 years, despite the economic recession, rising from 193 completions year 2009/10 up to 425 dwellings completed in year 2011/12.
- . Additional homes are needed to tie in with the higher growth rates proposed in the Borough Plan for employment based on completions, rather than on labour supply predictions.

**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.**

Replace "500 dwellings per year" by "at least 550 dwellings per year".

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Stoke-on-Trent City Council and Newcastle-Under-Lyme Borough Council ( )
Comment ID	PS402
Response Date	27/02/13 10:46
Consultation Point	6 Development Strategy ( <a href="#">View</a> )
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 Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Thank you for the opportunity to comment on the pre-submission documents for the Local Plan for Stafford Borough. As you are aware Stoke-on-Trent City Council and Newcastle-under-Lyme Borough Council have an adopted joint Core Spatial Strategy and this response has been agreed between the two authorities. Stoke City Council and Newcastle Borough Council fully support Stafford Borough's overarching Development Strategy however with regard to the Boroughs detailed policies the Authorities consider further clarification and detail is required within the Local Plan with regard to office development and at this stage object to Policy C6 relating to Gypsies, Travellers and Travelling Show People. In particular we would make the following comments: 1. Development Strategy

The Authorities continue to support the Development Strategy including the approach to achieving sustainable development and in particular support Policy SP2 - housing and employment requirements. The Plan makes provision for the development of 10,000 new dwellings at a rate of 500 dwellings per year, excluding additional requirements for military housing and provision for gypsies and travellers. This housing provision is distributed (Policy SP4) between Stafford (72%), Stone (8%), the Key Service Villages of Eccleshall, Gnosall, Hixon, Great Haywood, Little Haywood / Colwich, Haughton, Weston, Woodseaves, Barlaston, Tittensor and Yarnfield (12%) and the rest of the Rural Area (8%). These levels are derived from a sound evidence base and take a balanced view of the issues. Any increase in the provision of either of these (above the proposed levels) will have an adverse impact on:

? the targeted regeneration strategy for North Staffordshire; ? stemming out migration from the conurbation; and ? the efficient re-use of brownfield land.

The strategy therefore strikes the correct balance and adopts the right approach not to plan for a substantial increase in in-migration over the long term particularly from North Staffordshire as this would undermine the adopted Newcastle-under-Lyme and Stoke-on-Trent Core Spatial Strategy. In

particular Stafford Borough Council has recognised at paragraph 3.10 of the Local Plan the need to balance development requirements in Stafford Borough with the urban regeneration initiatives of the conurbation and reduce out-migration from North Staffordshire. The Plan recognises that this is particularly relevant to future development in the north of the Borough at Stone as well as other settlements within and outside of the North Staffordshire Green Belt. The Plan states 'Pending restoration of the housing market in North Staffordshire, substantial additional development in the north of Stafford Borough could harm the fragile market'.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Stoke-on-Trent City Council and Newcastle-Under-Lyme Borough Council ( )
Comment ID	PS403
Response Date	27/02/13 10:46
Consultation Point	4 SPATIAL PRINCIPLE 4 (SP4) ? STAFFORD BOROUGH HOUSING GROWTH DISTRIBUTION ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.5

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Housing growth distribution is therefore supported. This ensures that the distribution of housing provision is prioritised towards Stafford and ensures this can be achieved in a sustainable manner.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Stoke-on-Trent City Council and Newcastle-Under-Lyme Borough Council ( )
Comment ID	PS404
Response Date	27/02/13 10:46
Consultation Point	5 SPATIAL PRINCIPLE 5 (SP5) ? STAFFORD BOROUGH EMPLOYMENT GROWTH DISTRIBUTION ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.6

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The level of Employment Land provision over the plan period is also supported. Following the assessment of a number of options the Stafford Local Plan proposes an annual employment land rate of 8 hectares (160 hectares during the plan period). This employment land is distributed (Policy SP5) between Stafford (56%), Stone (12%) and the rest of the Borough Area (32%). The 32% distribution in the rest of the Borough reflects the three major developed sites in the Green Belt which have been identified as being suitable for employment development:

- . Hadleigh Park (Former Creda Works Limited), Blythe Bridge
- . Moorlands Industrial Estate, Swynnerton
- . Former Meaford Power Station, Meaford

The employment sites have not been specifically phased although Policy SP7 states that the use of brownfield land should be maximised to reduce the need for greenfield sites. The Policy states 'Only where insufficient sites on previously developed land, in sustainable locations, are available to meet new development requirements should greenfield sites be released.' Furthermore there have been a number of recent planning decisions which have granted planning permission for key strategic employment sites within the Borough including Redhill, Stafford. As these employment sites already have planning permission the discussion over whether such proposals are brought forward too early in the plan period is redundant as the decision has already been made. The quantum of employment land and the employment sites identified are supported. Furthermore there is no objection to the lack of phasing for employment sites for the reasons given above. 2. Office Development Policies The Authorities previously commented that the Plan for Stafford Borough needs to reflect the NPPF requirement for office development to be built on a centres first approach and to ensure office

development is not permitted out of centre unless demonstrated. Stafford Borough Council officers have stated that this will be reflected within the plan however it is unclear where provision for the sequential approach to locate offices in-centre is provided for within the Plan. Policy Stafford 1 - Stafford Town states that: 'vii The use of employment sites for employment purposes other than B1 (b & c) excluding offices (B1a), B2 and B8 will not be permitted unless it can be proved that the proposed use cannot be located within Stafford town centre.'

Policy Stone 1 - Stone Town uses the same wording to state where B1(a) office development should be directed.

It is considered that these policies are not however entirely clear and require re-wording to ensure that it is unambiguous that B1(a) office development should only be permitted on employment sites outside the town centres if it can be proved, through a sequential assessment, that proposed development cannot be located within the town centre or edge of centre sites. This town centre first approach to office development is in-line with national policy outlined in the National Planning Policy Framework.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Stoke-on-Trent City Council and Newcastle-Under-Lyme Borough Council ( )
Comment ID	PS405
Response Date	27/02/13 10:46
Consultation Point	29 Policy C6 ( <a href="#">View</a> )
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 Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Policy C6 sets out the Provision for Gypsies, Travellers and Travelling Show-people. The most up to date evidence base used to inform the provision for Gypsies, Travellers and Show People is the North Housing Market Area Gypsy and Traveller Accommodation Needs Assessment published in December 2007. This assessment covered the local authorities of East Staffordshire Borough, Newcastle-under-Lyme Borough Stafford Borough, Staffordshire Moorlands District and Stoke-on-Trent City. This assessment required provision for 76 pitches in Stafford Borough. However Policy C6 states that provision for pitches will be made in-line with that document or 'successor documents'. The Authorities **object** to the reference to 'or successor documents' as the authorities can not support any evidence base that we, or any other neighbouring authority, have not had the opportunity to review. Furthermore a new study may recommend that a reduction in the provision of pitches and this could in theory result in an increase in the provision for neighbouring authorities including Stoke-on-Trent and Newcastle-under-Lyme. It is understood that Stafford Borough Council are producing an updated Gypsy and Traveller Accommodation Needs Assessment but that assessment has not been presented as up to date evidence to the Local Plan at this stage. The above represents the Authorities formal representations to the Pre-Submission Local Plan documents. The Authorities will also be responding to Stafford Borough Council's request to sign Duty to Co-operate Protocols in due course. At this stage please note that the protocols presented to both Authorities require further amendment and consideration particularly following the outcome of this latest consultation. Both Stoke-on-Trent City Council and Newcastle-under-Lyme Borough Council will continue to co-operate on areas of common interest in a timely manner for the mutual benefit of neighbouring authorities.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	St Modwen Developments ( )
Comment ID	PS406
Response Date	27/02/13 16:56
Consultation Point	2 SPATIAL PRINCIPLE 2 (SP2) ? STAFFORD BOROUGH HOUSING & EMPLOYMENT REQUIREMENTS ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The NPPF is clear in that it requires Local Planning Authorities to ensure their strategies for the provision of housing, employment and other uses are integrated (paragraph 158). It requires LPA's to set out a clear economic vision and strategy which proactively encourages economic growth (paragraph 21) and to significantly boost the supply of housing (paragraph 47). The NPPF also requires that LPA's ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing (paragraph 47). It requires the preparation of a SHMA to assess the full housing needs working with neighbouring Authorities. The SHMA must meet the household and population projections and address the need for all types of housing including affordable housing (paragraph 159). It requires



LPA's to work collaboratively with other bodies to ensure strategic priorities across boundaries are properly co-ordinated and clearly reflected in Local Plans. Joint working is required (paragraph 179). LPA's will be expected to have demonstrated evidence of having effectively cooperated to plan for cross boundary issues with a continuous process of engagement from initial thinking to implementation (paragraph 181). The level of development set out within SP2 and as sought to be justified through the supporting evidence base is unsound and is not consistent with the approach required in the NPPF and will not meet full objectively assessed needs on the principal basis that;

- . The level of housing provision is significantly less than the most recent, objectively assessed levels of housing growth which were set out within the RSS Phase 2 Revision Panels Report. Neither the Plan, nor the evidence base provides justification for this particularly noting that the Plan for Stafford retains and remains committed to the Growth Point status (paras 3.15 to 3.17).
- . The Policy makes provision for 500 dwellings per annum over the plan period. The Plan period runs for 20 years from 2011 to 2031 and the Housing Trajectories within Appendix F seek to plan for this period. The housing provision fails to address provision since 2006 however and the RSS Phase 2 Revision included clear evidence of housing need since that time. Stafford Borough has seen a consistent under delivery of housing against needs since 2006. The Plan for Stafford should address housing needs from 2006 and address the shortfall in provision which amounts to some 914 dwellings against the RSS Phase 2 Revision (2386 delivery against 3300 requirement) or some 614 dwellings against the Plan for Stafford requirement (2386 delivery against 3000 requirement).
- . The Plan for Stafford approach merely "writes off" past housing requirements and under delivery and starts afresh at 2011. This is not sound. Not only should the Plan for Stafford include consideration of housing requirements from 2006 and address past under delivery, but should do so in a way which is consistent with the approach and provisions of the NPPF and its aims to significantly boost the supply of land for housing. Past under delivery should be addressed sooner rather than later and allowed for in the early years of the Plans housing trajectory.
- . Paragraph 6.10 states that the Council have given planning permission for 2,911 new houses as at March 2012. It further states that this provides for a 6 years supply based on 500 homes per year. This calculation is unsound. The 5 Year Supply Paper within the accompanying Evidence Base is also unsound. The requirement of 500 dwellings per year (even if, without prejudice to objections above it is assumed to be correct) needs to take on board historic under delivery; the NPPF requires a minimum 5% buffer in any 5 year supply calculation and in the case of Stafford Borough, there is clear evidence of the need to include a 20% buffer given past, persistent under delivery; such under-delivery should be met within the 5 year period; and the supply of 2,911 needs to be test for its deliverability within the 5 year period. The recent Castleworks appeal decision (APP/Y3425/A/12/2172968) confirms this required approach and that the Borough does not have a 5 year supply of land for housing. This is particularly important as the Plan's inaccurate recording of its 5 year land supply position results in an unsound housing trajectory and an unsound approach set out at paragraph 13.22 which states, inter alia, that because the Borough has a 5 year supply of land for housing, then the Plan does not require delivery from the Stafford SDL's or from Stone in the first five years of the Plan period. Notwithstanding the 5 year land supply position, this approach is also inconsistent with the NPPF which seeks to significantly boost the supply of land for housing.
- . The Plan for Stafford has not been prepared through diligent cross boundary consultation and engagement or demonstrated that the Council has effectively co-operated with other Authorities to plan for cross boundary issues with a continuous process of engagement from initial thinking to implementation. A key legal compliance test and requirement under s33A of the Planning and Compulsory Purchase Act 2004 is that the Plan has been prepared in accordance with the Duty to Co-operate. It is essential that the Council has engaged constructively, actively and on an ongoing basis with neighbouring councils on the strategic matter of the number of houses proposed in the Plan; they must have had regard to the responses of those consulted; and sufficiently considered whether to enter into agreements on joint approaches to plan making and thereby maximising the effectiveness of its plan preparation. These are all requirements of s 33A of the Act. The Plan merely refers to cross border meetings at paragraph 6.12 which does not fully embrace the requirements of statute.

**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 Plan should further justify the level of housing provision. Requirements from 2006 should be included within the Plan. Historic shortfalls in housing provision should be included and addressed early in the plan period. The Plan should recognise the absence of a 5 year land supply and plan for greater provision of land for housing earlier in the plan. A greater level of growth should be allowed for and additional allocations of land for housing included within the Plan, particularly focused on delivery within the early years of the Plan. The Council must demonstrate further that they have positively embraced the requirements of statute in respect of the Duty to Cooperate.

*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

**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**

St Modwen have a number of major land and development interests across the Plan area, and the representations made on their behalf address a wide range of complex and interrelated issues. Participation at the oral examination is necessary to ensure their position and views are properly explained and made.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	St Modwen Developments ( )
Comment ID	PS407
Response Date	27/02/13 16:56
Consultation Point	4 SPATIAL PRINCIPLE 4 (SP4) ? STAFFORD BOROUGH HOUSING GROWTH DISTRIBUTION ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3

**Justified:** the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

**Do you consider that the Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Policy SP4 sets out a distribution of housing growth between Stafford, Stone, Key Service Villages and the Rest of the Rural area. The proposed distribution of growth suggests some 72% for Stafford, 8% for Stone, 12% for Key Service Villages and 8% in the rural area. This moves away from the distribution within the former Local plan which saw a distribution of 78% for Stafford, 17% for Stone and 5% for Key Service Villages. Actual distribution and delivery has been more greatly accommodated within the Rural Area providing 35%, Stone at 17% and Stafford at 48%. The role of Stafford as the principal location for growth is supported, however levels of growth need to be sustainable and deliverable over the plan period. Over the preparation of the Plan there have been notable reductions in levels of growth for Stone and the rural areas and it is not clear or transparent as to why this distribution has been adopted over alternatives which could equally be sound and ensure delivery. We believe that Key Service Villages could sustain a greater level of growth as part of a sustainable strategy, reducing the level for the wider rural area and potentially redistributing some of the growth for Stafford. Given some 11 Key Service Villages, a proportionate level of provision may more realistically be around 20%.

Our objections elsewhere have highlighted a lack of 5 years supply of land for housing and the need for the plan to significantly boost the supply of housing. There are significant challenges to the delivery of the major Strategic Development Locations around Stafford and a more balanced distribution, promoting some early delivery with varied range of more housing allocations in all areas as well as particularly outside of Stafford town would create a plan which is more deliverable. This section of the Plan also includes a table of Housing Provision at paragraph 6.54. The representations above sit alongside other objections which have also been made about the overall housing provision and the Plan calculation of 5 year supply.

**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 distribution of housing should be amended to reduce an over reliance upon Stafford town and more fairly balance provision elsewhere in order to promote delivery and significantly boost supply, particularly in the early years of the plan.

*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

**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**

St Modwen have a number of major land and development interests across the Plan area, and the representations made on their behalf address a wide range of complex and interrelated issues. Participation at the oral examination is necessary to ensure their position and views are properly explained and made.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	St Modwen Developments ( )
Comment ID	PS408
Response Date	27/02/13 16:56
Consultation Point	7 SPATIAL PRINCIPLE 7 (SP7) ? SUPPORTING THE LOCATION OF NEW DEVELOPMENT ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.4

**Justified:** the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

**Do you consider that the Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The move towards the use of Settlement Boundaries is a positive improvement to the Plan compared to earlier draft versions. The approach replaces the former use of Residential Development Boundaries and will logically define a key land use planning distinction between the urban area and Open Countryside. However the Settlement Boundaries have only been defined for Stafford and Stone at this stage and not for all of the settlements within the Sustainable Settlement Hierarchy. Whilst the identification of Settlement Boundaries could be "put off" to a later plan, they are an important designation which should be established sooner rather than later, particularly as they create an important policy distinction. The Settlement Boundaries which have been drawn for Stone and Stafford bear no material differences to the former Residential Development Boundaries. There is no part of the Evidence base supporting the Plan which shows or explains how the Plan has carefully assessed or evaluated which land should be included within or outwith of the boundary. The accompanying text explains that Settlement Boundaries will be established that provide sufficient scope for the proposed scale of development of housing, employment and other uses within the settlement. Policy SP7 sets out various criteria which will be used to assess development proposals and hence influence the line of the Settlement Boundaries to be defined in the areas other than Stafford and Stone. It is logical that this

full range of criteria have been used to establish the Settlement Boundaries for Stafford and Stone which are defined in the Plan however there is no Evidence to explain or justify this. Whilst the principle of Settlement Boundaries is supported;

- . The Boundaries should be established now
- . The proposed Boundaries for Stafford and Stone are included in the Plan but have not been fully assessed or supported by any evidence to justify their extent.
- . Moreover, the Boundaries within the Plan do little than merely follow the former Residential Development Boundaries of the old Local Plan.
- . The Boundaries must be established for Stafford and Stone having regard to the same criteria which are to be used for the wider settlements.
- . The Boundaries for Stafford and Stone must include sufficient scope for the proposed scale of development in the Plan for housing, employment and other uses commensurate with their principal role.

Two examples are set out on the attached Plans, SMD1 and SMD 2. Both demonstrate examples of where the Settlement Boundaries have not been appropriately assessed and currently exclude land which should logically be included within the defined Boundary. SMD 1 shows the Alstom premises at St Leonards Avenue in Stafford. They are excluded from the Settlement Boundary but logically form part of the urban area and should be included within it. Moreover the site has planning permission for redevelopment to part new employment use and part housing, amounting to some 270 dwellings together with new public open space. The Settlement Boundary should reflect this extent of approved development which has been adjudged to be acceptable and supports the growth of Stafford.

SMD 2 shows the former Castleworks site off Caste Street, Stafford. It has recently been the subject of a planning appeal (APP/Y3425/A/12/2172968) which was allowed and granted planning permission for residential development. The Inspector confirmed in her decision letter that "the character of the area is previously developed and urban. Whilst the site is edge of settlement, it is not rural or countryside in character, having been developed as a factory many years ago". The site should accordingly be included in the Settlement Boundary.

**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 proposed Settlement Boundaries are supported however;

- . The Boundaries should be defined for all settlements now.
- . The Boundaries for Stafford and Stone should be supported by evidence that they have been appropriately defined, provide sufficient scope for anticipated future growth and have adopted the same criteria as for other settlements set out in the Policy.
- . They should include the land shown in Plans SMD1 and 2.

*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.*

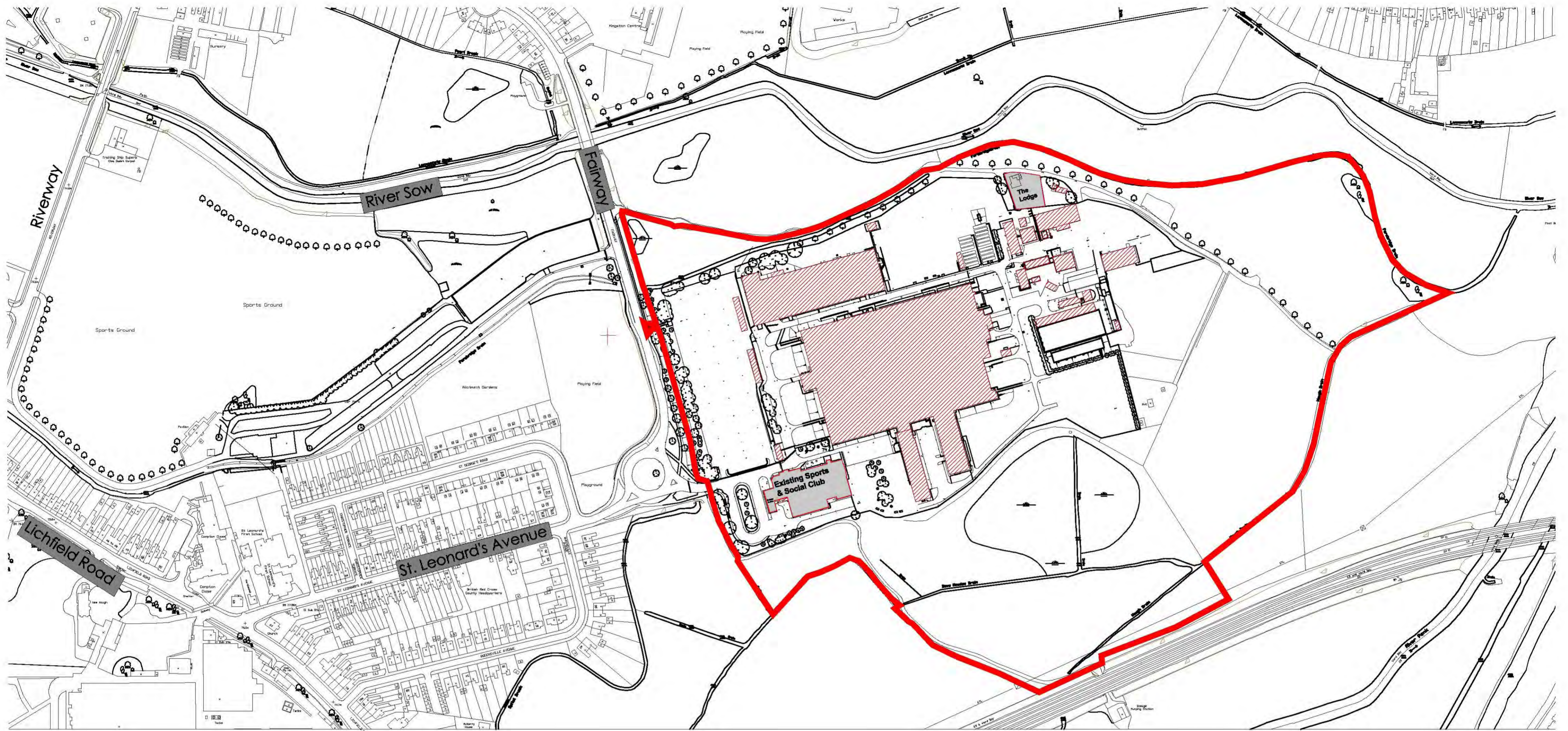
After this stage, further submissions will only be at the request of the Planning Inspectorate, based on the matter and issues he / she identifies for examination

**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

**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**

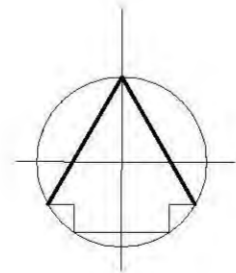
St Modwen have a number of major land and development interests across the Plan area, and the representations made on their behalf address a wide range of complex and interrelated issues. Participation at the oral examination is necessary to ensure their position and views are properly explained and made.



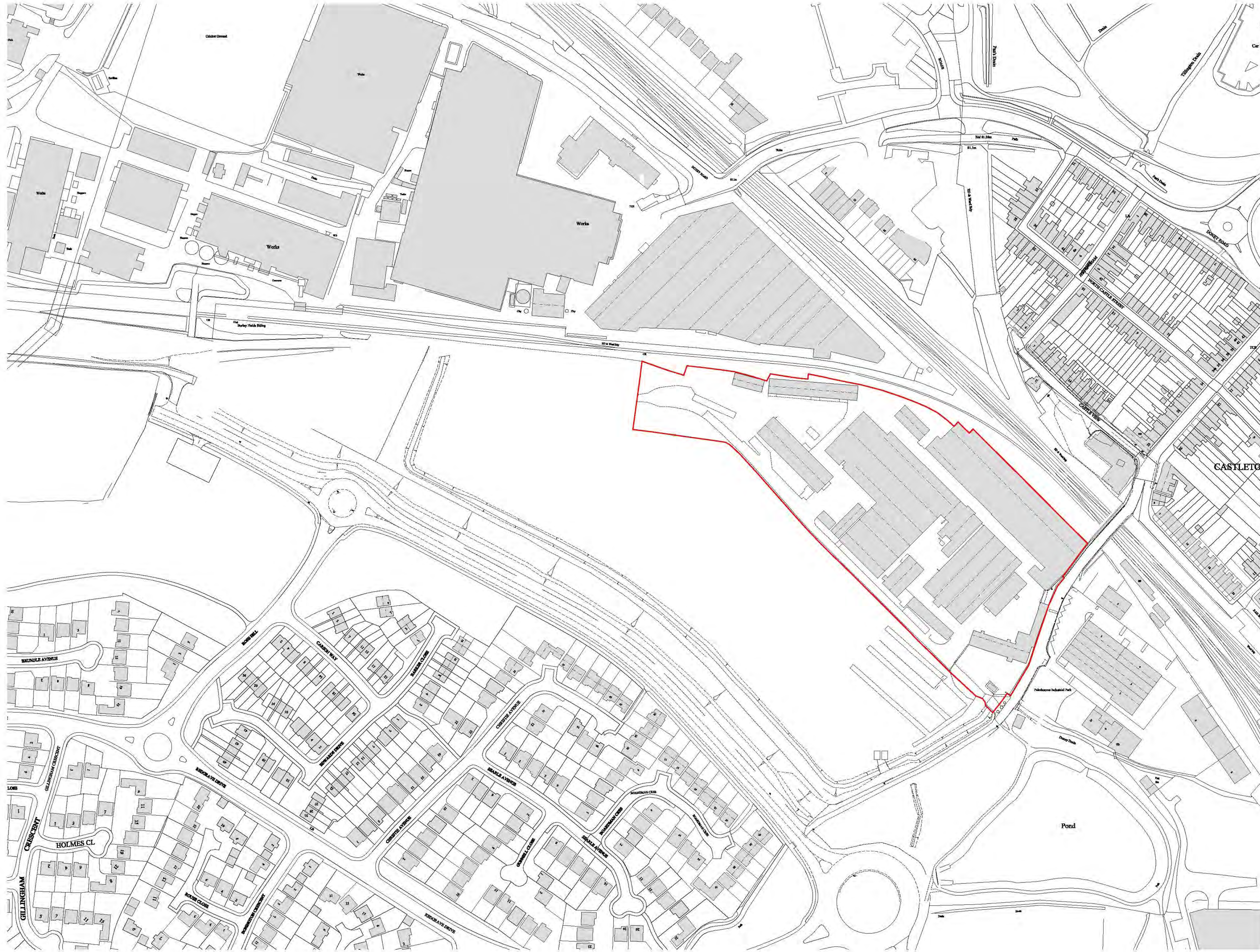
Plan SMD 1 - Land at St Leonard's Ave



Scale







Plan SMD 2 - Former Castleworks, Castle Street, Stafford

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Walton Homes
Comment ID	PS409
Response Date	28/02/13 11:59
Consultation Point	2 SPATIAL PRINCIPLE 2 (SP2) ? STAFFORD BOROUGH HOUSING & EMPLOYMENT REQUIREMENTS ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

SPATIAL PRINCIPLE 2 (SP2) SPATIAL PRINCIPLE 4 (SP4) SPATIAL PRINCIPLE 6 (SP6) - ACHIEVING RURAL SUSTAINABILITY SPATIAL PRINCIPLE 7 (SP7) Key Diagram Policy C2 Affordable Housing Policy C5 Residential Proposals outside the Settlement Hierarchy SPATIAL PRINCIPLE 2 (SP2) SPATIAL PRINCIPLE 4 (SP4) We object to Policy SP2 and SP4 on the basis that the Housing Strategy relies too heavily upon sites in Stafford to deliver the strategy and does not take enough account of the potential of the key service villages such as Hixon. We also object to the target of 500 homes per annum on the basis that this is too low a figure to provide for the needs of the Borough's future predicted housing growth. The plan has already failed to deliver the 500 homes required per

annum within the first year of the plan, with only 424 homes being completed. On this basis, (which was a significant increase on the previous two years completions rates, where only 193 and 220 homes were constructed respectively) the plan is already failing to deliver based upon the existing commitments. Concern is raised as to the success of future delivery rates based on recent performance, which is patchy at best over the last 3 years. In order to address this, a higher overall housing figure of a minimum of 11,500 homes over the plan period should be adopted to reflect the latest household projections (which are referenced within the plan.) It is apparent that in order to deliver the plan the strategic housing growth locations must be in places that are attractive to the market and given the fragile state of the economy it is apparent that smaller sites are more deliverable than a reliance upon larger allocations. We object to the large allocations proposed around Stafford, which we object to on grounds of deliverability. The initial costs and time for infrastructure delivery associated with such sites will not bring homes forward early within the plan period. Sites such as those within the key service villages are attractive to the market and are therefore far more deliverable and at a rate that they can help achieve the housing requirement. Based on the first years performance alone the plan will fall 1520 homes short of the target for the borough by the end of the plan period. It is however apparent that the key service villages can and are delivering with completions at 99 homes in the last year in comparison to only 120 completions in Stafford itself. We therefore consider the proposed growth strategy within the plan is fundamentally flawed in terms of both the overall housing target and the likely deliverability of such large development sites on the edge of Stafford. These are not considered able to bring the required level of homes forward to ensure the housing target is met in an effective manner and will result on too many large sites being expected to deliver later on within the plan period. This will also require a large amount of sales in close proximity, which is not considered to be achievable within the current and foreseeable economic climate. SPATIAL PRINCIPLE 6 (SP6) - ACHIEVING RURAL SUSTAINABILITY It is considered that additional growth within the key service villages can help achieve support for a sustainable rural economy. Growth in the key service villages can help assist a sustainable critical mass and will therefore increase sustainability, as such housing growth can help support local schools and businesses to ensure that service villages have the ability to support and expand the services for which they have been so named within the plan (i.e. key service villages). SPATIAL PRINCIPLE 7 (SP7) This policy requires rewording as it is unworkable in its current format and it is unclear where and when settlement boundaries will be established. It needs to make it clear that when boundaries are altered provision for new development will be included within the amended boundaries. It is not clear in the current wording of the policy how and when this will take place. In order to amend these boundaries it is clear that sites will have to have been considered and effectively allocated in order to amend these boundaries to include for new development. This policy therefore appears unworkable without this information. It would appear that it will also lead to a retrofitting of sites to boundaries without the opportunity for the public to comment on the suitability of this in terms of considering the plan as whole. Key Diagram We object to the key diagram on the basis that it should reflect the amended growth split as we have set out in our objection to SP4 and its suggested alterations below. Policy C2 Affordable Housing

The amounts identified are too high in a fragile housing market, where housing deliverability in any format is proving difficult for large sections of the market. Trying to secure the percentages of affordable homes as identified is unrealistic and may jeopardise the overall delivery of the housing strategy. The figures identified should therefore be halved to a maximum of 15/20% respectively.

#### Policy C5 Residential Proposals outside the Settlement Hierarchy

This policy needs to be amended to be far less prescriptive, it is considered to be far too onerous and not in accordance with the NPPF (Section 7 on Good Design). It is not positively prepared and is therefore out of step with the NPPF. Section C should be removed as it does not promote development in a positive fashion and give the ability to take account of good design and is therefore also out of step with the NPPF.

#### Policy C5 Residential Proposals outside the Settlement Hierarchy

B. Replacement Dwellings should be expanded to include a catch all element, that states that "J. Replacement/new dwellings will be considered on the relative merits of the scheme and the circumstances and history of the site.

**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.**

SPATIAL PRINCIPLE 2 (SP2) Changes are required to the Spatial Principal 2 (SP2) to increase the proposed housing target from 500 dwellings per year to a minimum of 575 homes in order to achieve a minimum of 11,500 new homes for the borough, in order to ensure that the required projected household requirement is achieved. SPATIAL PRINCIPLE 4 (SP4) The Spatial Principle 4 (Sp4) also requires to be amended to redistribute a higher percentage of the new overall housing target of 11,500 new homes to the key service villages where demand for new homes and sites are both available and have significant developer interest. This should see the current proposed percentage housing split be altered from 12% to 20% for the key service villages bearing in mind that these villages are made up of 12 separate settlements. With a reduction in the total housing provision in and on the edge of Stafford to 64% to reflect the overall higher housing target. It is clear from the first year's completions that the key service villages are desirable to the market and can deliver. SPATIAL PRINCIPLE 6 (SP6) - ACHIEVING RURAL SUSTAINABILITY This policy should include wording that makes it clear that growth in the key service villages can help them assist a critical mass and with therefore increase sustainability as such housing growth can help support local schools and businesses to ensure that service villages have the ability to support and expand the services for which they have been so named within the plan. SPATIAL PRINCIPLE 7 (SP7) This policy requires to be reworded as it is unworkable in its current format it is unclear where and when settlement boundaries will be established it needs to make it clear that when boundaries are altered provision for new development will be included within the amended boundaries. It is not clear in the current wording of the policy how and when this will take place The following wording should be removed: 'Development proposals should maximise the use of brownfield redevelopment sites within the Borough's towns and villages to reduce the need for greenfield sites. Only where insufficient sites on previously developed land, in sustainable locations, are available to meet new development requirements should greenfield sites be released. The removal of this is required in order to promote development, it is clear that the most sustainable developable deliverable sites should be those that are developed first. These may be on Greenfield sites rather than always taking the brownfield first approach, where many sites may be unviable in the current market. Policy C2 Affordable Housing

The amounts identified are too high in a fragile housing market, where housing deliverability in any format is proving difficult for large sections of the market. Trying to secure the percentages of affordable homes as identified is unrealistic and may jeopardise the overall delivery of the housing strategy. The figures identified should therefore be halved to 15/20% respectively.

Policy C5 Residential Proposals outside the Settlement Hierarchy

This policy needs to be amended to be less prescriptive, it is considered to be far too onerous and not in accordance with the NPPF (Section 7 on Good Design). Section C should be removed as it does not promote development in a positive fashion and give the ability to take account of good design and is therefore out of step with the NPPF.

Policy C5 Residential Proposals outside the Settlement Hierarchy

B. Replacement Dwellings should be expanded to include a catch all element, that states that "J. Replacement/new dwellings will be considered on the relative merits of the scheme and the circumstances and history of the site.

*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

**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**

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.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	St Modwen Developments ( )
Comment ID	PS410
Response Date	27/02/13 16:56
Consultation Point	8 POLICY STAFFORD 1 ? STAFFORD TOWN ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3

**Justified:** the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

**Do you consider that the Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Stafford 1 includes Policy which seeks to resist the loss of employment land to non employment generating uses. To be consistent with the Plan and the NPPF in terms of maximising the potential of previously developed land, some re-use of former employment land to housing is likely to be inevitable. The Policy does allow for this in limiting circumstances. The criteria within the policy should however been expressed as alternatives and not cumulative requirements, particularly criterion 4 where the benefits arising from the redevelopment of the site outweighs the retention of the site in its existing use. Given the inclusion of Policy E3 of the Plan which seeks to restrict employment uses within Recognised Industrial Estates, this section of Policy Stafford 1 is not needed.

**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.**

This section of the policy should be deleted as Policy E3 appropriately protects Recognised Industrial Estates. As a minimum, each of the criterion within the Policy should be expressed as "or" not "and" as stated to ensure sufficient flexibility.

*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 you wish to participate at the Examination in Public, please outline why you consider this to be necessary**

St Modwen have a number of major land and development interests across the Plan area, and the representations made on their behalf address a wide range of complex and interrelated issues. Participation at the oral examination is necessary to ensure their position and views are properly explained and made.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	St Modwen Developments ( )
Comment ID	PS411
Response Date	27/02/13 16:56
Consultation Point	10 POLICY STAFFORD 3 ? WEST OF STAFFORD ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.4

**Justified:** the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

**Do you consider that the Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Proposals for Strategic Development Location to the West of Stafford, linked to the delivery of the Western Access Improvement Scheme from Martin Drive to Doxey Road is supported and this support extends to its inclusion within Policy Stafford 1. As a major development proposal within the Plan, it is essential that the development is shown to be deliverable and achievable within the Plan period. The Policy sets out a number of site specific requirements including critical infrastructure which is also set out within the Infrastructure Delivery Plan at Appendix D. The Plan and accompanying evidence needs to demonstrate that this Infrastructure is deliverable and that necessary agreements are in place and land is duly assembled in order to ensure deliverability of the development.

The former Castleworks site should be removed from the allocation. Planning permission has now been granted on appeal for its residential redevelopment. It is shown on Plan SMD 2 and separate representations have been made suggesting its inclusion within the new Settlement Boundary for Stafford. Land immediately to the south of the former Castleworks site is in part to be delivered as Suitable Alternative Natural Greenspace (SANG) as part of the Castleworks approved development. This SANG could meet wider needs than just the Castleworks site and could contribute to the provision of SANG within the West of Stafford SDL. It could appropriately still be included in the West of Stafford SDL. Land further to the south and west is needed for the Western Access Improvement Scheme.



In addition to the above it is also pointed out that the Interactive Proposals Map provisions do not match the allocations and areas of land proposed for development within the text of the Plan for Stafford or the Concept Diagram, particularly so in respect of the proposed mixed use areas where the Interactive Map consults on the basis of these being employment areas. The consultation is unsound.

On the basis that these objections seek the removal of the Castleworks site from the Policy Stafford 3 Boundary, we have not made any detailed comments at this stage in respect of the detailed wording of the Policy Stafford 3. Our representations and concerns about the policy, submitted at earlier stages of the Plan's preparation still remain valid, should Castleworks remain in the Policy Stafford 3 area.

**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 Plan and its accompanying evidence should include a greater level of certainty and information to demonstrate that the site is deliverable within the Plan period. The former Castleworks site should be removed from the allocation but remaining land to the south and south west could be retained within the West of Stafford SDL.

*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 you wish to participate at the Examination in Public, please outline why you consider this to be necessary**

St Modwen have a number of major land and development interests across the Plan area, and the representations made on their behalf address a wide range of complex and interrelated issues. Participation at the oral examination is necessary to ensure their position and views are properly explained and made.



## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	St Modwen Developments ( )
Comment ID	PS412
Response Date	27/02/13 16:56
Consultation Point	18 Policy E5 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.4

**Justified:** the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

**Do you consider that the Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Policy E5 is not consistent with the NPPF in its approach to Green Belt and the identification of Major Developed Sites. The concept of Major Developed Sites was previously included within PPG 2 which has now been superseded by the NPPF. In accordance with paragraph 89 of the NPPF, limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development is not inappropriate development by definition.

**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.**

Policy E5 should be deleted.

*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

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**If you wish to participate at the Examination in Public, please outline why you consider this to be necessary**

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## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	St Modwen Developments ( )
Comment ID	PS413
Response Date	27/02/13 16:56
Consultation Point	21 Policy E8 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3

**Justified:** the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

**Do you consider that the Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

There is no justification for restrictions on the range of goods sold from developments to be enforced via legal agreement. In circumstances where such restrictions are capable of being enforced via condition this should be the preferred route. The statement that, "No new development for retail warehouses and superstores is required in these locations at Stafford" should be deleted. This reflects a negative approach to new development rather than the positive approach advocated by national policy, and also may well be overtaken as the market changes. Proposals for off centre development should follow a criteria-based approach as set out in national policy, and if these criteria are met then planning permission should be granted. There is no requirement in national policy to demonstrate "need" for retail development, and this should be removed from the policy (part i). The part of the policy beginning, "Loss of an existing facility..." is unclear and therefore will be ineffective; as written it is also unjustified as it would not represent the most appropriate strategy. The reference to loss of an "existing facility" does not define what is meant by "facility"; on the face of it this would (for example) potentially prevent a change of use within a centre from one centre use to another.

**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 reference to legal agreement should be deleted. The sentence beginning, "No new development for retail warehouses..." should be deleted. Part i of the policy should be deleted and replaced with, "The proposed retail development is consistent with the requirements of the sequential and impact tests as set out in the NPPF." The sentence beginning, "Loss of an existing facility..." should be deleted, and replaced with text consistent with paragraph 70 of the NPPF.

*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

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**If you wish to participate at the Examination in Public, please outline why you consider this to be necessary**

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## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	St Modwen Developments ( )
<b>Comment ID</b>	PS414
<b>Response Date</b>	27/02/13 15:56
<b>Consultation Point</b>	32 Policy N2 ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	0.5

**Justified:** the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

**Do you consider that the Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The Policy sets out a range of sustainable design features which new development is expected to incorporate. Whilst the policy allows for submissions on viability to off set such requirements, there is no part of the Plans evidence base which explains how the level of environmental standards proposed in the policy are viable for most developments. The NPPF states at paragraph 173 that "sustainable development requires careful attention to viability and costs in plan making". The cumulative impact of all policy requirements needs to be fully understood. Submissions are made elsewhere about the cumulative impact of Policy requirements within the Plan and evidence of development viability, Plan delivery and therefore SEA robustness.

**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.**

Further evidence is required to demonstrate that the environmental building standard proposed are viable.

*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

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## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	St Modwen Developments ( )
Comment ID	PS415
Response Date	27/02/13 15:56
Consultation Point	36 Policy N6 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.4

**Justified:** the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

**Do you consider that the Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The policy sets out consideration of the Cannock Chase SAC and implications for new development proposals. The Policy is stated to apply to all development. It should only apply to development which is likely to result in additional visitor numbers to the SAC and is likely to have a significant effect on the SAC. As drafted it is unclear as to whether the policy only applies to housing or other development uses. The Policy refers to the Cannock Chase Visitor Impact Mitigation Strategy however this document, which is understood to be under review and has not been formally published in its final form, is not included in the Consultation or the Plans evidence base. The Policy should include specific provisions and should not refer to other documents which are outside the Council's control and could change.

**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 Policy should be amended to set out its own requirements for development and not refer to other documents outside of the Plans control.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	St Modwen Developments ( )
Comment ID	PS416
Response Date	27/02/13 16:56
Consultation Point	40 Policy I1 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3

**Justified:** the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

**Do you consider that the Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

This policy relates to Infrastructure Delivery and recognises that such infrastructure as set out in the Infrastructure Delivery Plan is critical to the Plan. A key aspect of soundness is the ability for the Plan to meet its objectively assessed development and infrastructure requirements and that it is deliverable over the plan period. Delivery is challenging in the current economic climate and is likely to be so during a considerable part of the plan period. This will have an impact on development delivery going forward as it has done so over recent years. It is important that the Plan is supported by robust evidence to demonstrate that development and infrastructure is capable of being delivered over the plan period. This is particularly important given that the Plan describes "critical" infrastructure requirements which are set out in Appendix D as part of the Delivery Plan. The evidence supporting implementation and delivery is not robust and we have significant concerns that the planned development and infrastructure and is not deliverable over the plan period, noting principally;

- . The Viability report within the evidence base focuses on the delivery of affordable housing. The NPPF states at paragraph 173 that "sustainable development requires careful attention to viability and costs in plan making". The cumulative impact of all policy requirements needs to be fully understood. The potential for non-delivery of all policy aims and aspirations due to viability needs to be considered in the SEA.

- . Without evidence it will not be possible to demonstrate that development would be able to support all policy requirements, cumulatively. Development may also not be able to support Community Infrastructure Levy (CIL). Key infrastructure requirements which are dependent upon CIL are likely to be undeliverable, again contrary to the aims and vision of the plan.
- . If cumulative policy requirements are unlikely to be deliverable, then the Strategic Environmental Assessment is fundamentally flawed. The SEA expects the policy requirements to be met. The SEA also places great reliance in its conclusions on the environmental requirements and mitigations of policy. It also places reliance upon infrastructure improvements in order to conclude the plan is sustainable.
- . The Plan includes Critical Infrastructure within Annex D. Sources of funding are set out within the Annex which includes public sector funding and CIL in many cases. Capital Costs are incomplete however more importantly there is no evidence or certainty of funding streams which are neither explained in the Plan or its evidence base.
- . CIL is explained as being important to the Plan, yet the viability analysis of CIL has not been produced or consulted upon. CIL cannot yet be relied upon as a key component of infrastructure funding.
- . The NPPF suggests that CIL should be worked up and tested alongside the Plan. This is an approach which is important to the Plan for Stafford as it is relying on CIL to deliver required infrastructure. CIL has not advanced to a sufficient stage to demonstrate it can in any way be relied upon to contribute to infrastructure funding. CIL has not been advanced alongside the plan but instead is being added at a late stage. This runs the serious risk of CIL being set at too high a level in order to meet aspirational and unviable infrastructure requirements which have already been set out in the plan.
- . If CIL is not yet set or advanced, it will have the effect of;
  - . Not knowing the level of funds which could be sourced/secured.
  - . It will not be possible to know how much infrastructure could be funded.
  - . The plans infrastructure / development balance cannot be set.
  - . The plan does not provide robust evidence to explain how the infrastructure upon which it relies will be deliverable.
- . Where principal infrastructure improvements are most likely to be delivered by the public sector through central funding and pooled contributions through CIL as well as other central government incentives, their needs to be clear evidence that the Council is making forward plans to deliver the required infrastructure at the required time in order to enable the development in the plan to be delivered. The plan, as drafted, presents significant risks that funding for infrastructure will neither be available or infrastructure delivered by the public sector in order for the development in the plan to be brought forward. The absence of clear evidence on viability suggests;
  - . The amount of development set out in the plan may not be deliverable - Only the viable sites will be delivered, leaving more challenging sites - The amount of affordable housing delivered will be significantly less than expected. - Sustainable policy objectives will not be met - The SEA will not be sound in its conclusions as it expects delivery of policy objectives, affordable housing and infrastructure - It will fundamentally compromise the plan's Vision and objectives

**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.**

Policy needs to be flexible in order to allow development to proceed where full policy requirements is likely to make development unviable. CIL must be further advanced in order to ensure it is in place at the adoption of the plan.

CIL must be further advanced so that the level of funds which can be viably delivered through CIL can be fully understood and inputted into the Infrastructure Delivery Plan

The infrastructure improvement aims and aspirations of the plan need to be further tested to assess whether they are deliverable, having regard to realistic levels of CIL and public sector funding streams

Viability evidence needs to look more closely at the largest and key development proposals in the plan in order to ensure the plan proposals are deliverable overall and that the scale of infrastructure and policy burdens does not mean that their ability to be developed viably is threatened.

There is no evidence to explain how the Council is preparing for infrastructure delivery.

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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**

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## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Natural England ( Hayley Pankhurst)
Comment ID	PS417
Response Date	28/02/13 12:00
Consultation Point	12 POLICY STONE 1 ? STONE TOWN ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.5

**Justified:** the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

**Do you consider that the Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Thank you for your consultation on the above dated 14 January 2013 which was 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.

There is much to support in this Publication Draft of the Plan for Stafford Borough. However, Natural England has some significant concerns regarding the Habitats Regulations Assessment and the policies relating to European sites, notably Policy N5 - Sites of European, National & Local Nature Conservation Importance, and Policy N6 - Cannock Chase Special Area of Conservation (SAC). It is our view that in its present form the Plan is not sound or legally compliant, but that the issues raised can be resolved. We would be pleased to agree changes and revised wording in advance of the Examination, in the form of a Statement of Common Ground or similar, if this would assist the LPA.

In addition to our comments on the soundness of the Plan, we would like to recommend several minor amendments, intended to further improve the Plan. For your ease of reference, our detailed response below presents:

1. Comments on the Habitats Regulations Assessment a. Habitat Regulations Assessment for The Plan for Stafford Borough - Publication in Respect of Natura 2000 Sites b. Habitat Regulations Assessment for The Plan for Stafford Borough - Publication in respect of Cannock Chase Special Area of Conservation (SAC) 2. Comments on the Plan a. Matters of soundness and legal compliance b. Recommended minor amendments

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Whilst we welcome the references to Green Infrastructure within this policy, there are no specific references to the requirement for mitigation in relation to Cannock Chase SAC. Stone appears to be within the currently accepted Zone of Influence for Cannock Chase SAC. We therefore recommend that the policy includes a reference to the need for mitigation. We note that such references are included in relation to policies for Stafford.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Natural England ( Hayley Pankhurst)
Comment ID	PS418
Response Date	28/02/13 12:00
Consultation Point	13 POLICY STONE 2 ? WEST & SOUTH OF STONE ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3

**Justified:** the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

**Do you consider that the Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Stone appears to be within the currently accepted Zone of Influence for Cannock Chase SAC, and, in any case, these development allocations are large enough to require mitigation for the potential impacts they would have on the SAC. We therefore recommend that the policy includes a reference to the need for mitigation. We note that such references are included in relation to policies for Stafford.



## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Natural England ( Hayley Pankhurst)
Comment ID	PS419
Response Date	28/02/13 12:00
Consultation Point	30 Policy C7 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.6

**Justified:** the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

**Do you consider that the Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**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.**

Natural England is disappointed that the policy does not include information on Suitable Alternative Natural Greenspace (SANGS), which are an essential component of the mitigation for the identified adverse effects on the integrity of Cannock Chase SAC. We advise improved cross references with an improved policy N6.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Natural England ( Hayley Pankhurst)
Comment ID	PS420
Response Date	28/02/13 12:00
Consultation Point	35 Policy N5 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3

**Justified:** the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

**Do you consider that the Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Natural England fully supports the intent of this policy. However, it is our view that in its current format the policy is not sound or legally compliant. Parts of the policy require substantial revision, in order to improve the relationship with the evidence base and compliance with legislation. Natural England would be happy to discuss this further and to agree revised wording in a Statement of Common Ground, in advance of the Examination, if this would assist the LPA. European Sites The references to the Habitat Regulations Assessment process could be misleading and should be clarified. In the policy itself, the further parts of the HRA process, around 'alternatives' and 'reasons of overriding public interest?', have currently been omitted. We recommend adding a point c, to cover these. In the supporting text paragraph 12.37, there is an incorrect statement that HRA is also known as Appropriate Assessment. Habitats Regulations Assessment (HRA) is not the same thing as Appropriate Assessment (AA). AA is just one stage of the HRA process. HRA is an 'umbrella' term that describes the whole process from screening for likely significant effects through to the appropriate assessment stage and beyond, if required. Natural England's response to the previous consultation on the emerging Local Plan (our ref 33025 - Oct 11) recommended that this reference to AA should be removed. As this has not been followed, we are repeating the recommendation here. Air Quality In relation to air quality, it is Natural England's opinion that Policy N5 is not sound and that changes are required to ensure the protection of Cannock Chase SAC. The issue is largely one of timing; the Local Plan submission draft has come forward in advance of a completed evidence base. The LPA has therefore included a policy

in the Local Plan which effectively pushes the HRA requirement down to project level. The protective regime of the Habitats Regulations is intended to operate at differing levels. In some circumstances assessment 'down the line' will be more effective in assessing the potential effects of a proposal on a particular site and protecting its integrity. However, it is recommended that three tests should be applied to determine when this is appropriate. It will be appropriate to consider relying on the HRA of lower tier plans (e.g. planning applications), in order for a LPA to ascertain a higher tier plan would not have an adverse effect on the integrity of a European site, only where: A] The higher tier plan assessment cannot reasonably assess the effects on a European site in a meaningful way; whereas B] The Habitats Regulations Assessment of the lower tier plan, which will identify more precisely the nature, scale or location of development, and thus its potential effects, will be able to change the proposal if an adverse effect on site integrity cannot be ruled out, because the lower tier plan is free to change the nature and/or scale and/or location of the proposal in order to avoid adverse effects on the integrity of any European site (e.g. it is not constrained by location specific policies in a higher tier plan); and C] The Habitats Regulations Assessment of the plan or project at the lower tier is required as a matter of law or Government policy. In this case, it is Natural England's opinion that the Local Plan is the appropriate stage to undertake at least some of the HRA work, in order to have confidence that the proposals for growth in the Core Strategy can proceed without adverse effects on site integrity in terms of air quality. It is therefore advised that the HRA requirement cannot be entirely pushed to lower tier plans or projects because the local plan, as the higher tier plan, will constrain locations for development to those set out within the plan, and such locations may fail the HRA tests at the project level, if the plan proceeds with uncertainty. We are also concerned that points 2 and 3 of the policy place too much of the onus on the applicant to deliver mitigation for what is actually a strategic problem and best dealt with through strategic solutions. In our view Policy N5 and its supporting text need to fully explain the air quality issues for Cannock Chase SAC, including making reference to the ongoing work by the Cannock Chase SAC Partnership (which Stafford Borough is a member of). The LPA should have regard to the evidence gathered and considered by the Partnership to date, in order to form a view as to whether there will be viable options for mitigation. If there isn't confidence that the plan is flexible enough to accommodate mitigation measures, or indeed that there is uncertainty about whether there will be effective mitigation measures, the potentially damaging aspects of the Plan should not be taken forward. Natural England would be happy to assist the LPA further in the redrafting of this policy. It is possible that at least some of the mitigation measures will be in the form of traffic management. The LPA should therefore consider how such measures might be effectively implemented, which may need the policy support of your Local Transport Plan. Whilst it is appreciated that work on this matter is current and not finalised, the LPA should give as much clarity and certainty as is currently possible, drawing on work to date. The Policy needs flexibility to ensure commitment to the SAC Partnership's final recommendations, making it clear that development can only proceed in accordance with the mitigation measures that the Partnership agrees. During the interim period, it is agreed that developers should be required to undertake their own HRA, drawing upon the most up-to-date SAC Partnership evidence. Points A & B of Policy N5 (and the Habitats Regulations themselves) would then ensure that due process was followed and AEIOI were not allowed to occur. We look forward to discussing this further with the LPA.

**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.**

**Water Quality and Supply** We recommend deleting the word "unauthorised". Protected and Priority Species and Habitats We welcome the insertion of the following, in line with our previous recommendations (our ref 33025 - Oct 11): "protected species or any species or habitat of principal importance for nature conservation". However, it is our opinion that the policy does not do enough to promote the protection and enhancement of habitats and species outside of designated nature conservation sites. The NPPF requires planning policies to promote the preservation, restoration and re-creation of priority habitats and the protection and recovery of priority species populations (paragraph 117). We recommend inserting words to this effect.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Natural England ( Hayley Pankhurst)
Comment ID	PS421
Response Date	28/02/13 12:00
Consultation Point	36 Policy N6 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3

**Justified:** the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

**Do you consider that the Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**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.**

Natural England fully supports the intent of this policy. However, in its current format it is our view that the policy is not sound or legally compliant, and that substantial rewording is required in order to improve the policies relationship with the evidence base and ensure compliance with policy. Natural England would be happy to discuss this further with the LPA and to agree revised wording in advance of the Examination, if this would assist the LPA. Our main concerns are as follows:

#### **Zone of Influence**

The policy quotes 400m and 12 mile thresholds, taken from the Cannock Chase Visitor Impact Mitigation Strategy (Footprint Ecology, 2009). Further work has been undertaken since the publication of this report, and the Cannock Chase SAC Partnership is currently considering revising these distances to reflect recommendations made in the "Cannock Chase SAC Visitor Impacts Mitigation Report? (Footprint Ecology 2012). We therefore recommend that the policy does not quote distances, but refers instead to the "Zone of Influence", as identified by current evidence and subject to future work.

**Avoidance and Mitigation** The policy/supporting text needs to make it clear that the work of the Cannock Chase SAC Partnership is ongoing and that mitigation requirements may be subject to further change as understanding evolves. The "Cannock Chase SAC Visitor Impacts Mitigation Report? (Footprint Ecology 2012) recommends that a set number of strategic Suitable Alternative Natural

Greenspace (SANGs) sites will be identified and delivered through developer contributions. Larger development sites (recommended threshold 50 homes and over) may be required to deliver targeted, additional open space of a size and quality sufficient to counteract their impacts on the SAC. Other mitigation measures may include improvements to existing greenspaces, access, visitor facilities or awareness raising. It is essential that the policy includes a "hook" to levy funding from developers towards a suite of mitigation measures, to be confirmed through further work being undertaken by the SAC Partnership. All mitigation should be agreed with the LPA and Natural England.

**Process** The policy/supporting text should clarify where developers/applicants can get further information and guidance. The LPA is the decision making authority and will be the competent authority when it comes to the HRA of projects; therefore the LPA should be prepared to guide applicants through discussion and/or the production of a Supplementary Planning Document (SPD). Natural England's role is an advisory one, and whilst we are happy to provide assistance where appropriate and indeed would wish to be consulted on all mitigation proposals, it is not our role to guide developers as currently implied in paragraph 12.39: "12.39 ... Planning applications will be required to provide information relating to the possible negative impacts highlighted above, through discussions with Natural England".

We suggest amending this sentence to reflect our advisory role.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Natural England ( Hayley Pankhurst)
Comment ID	PS422
Response Date	28/02/13 12:00
Consultation Point	2 Spatial Portrait for Stafford Borough (Where are we now?) ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3

**Justified:** the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

**Do you consider that the Plan for Stafford Borough is Sound?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**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.**

We would like to recommend a minor amendment intended to improve the join up through the plan and to ensure its compliance with European legislation and policy.

We note that the 'environment?' section does not mention Cannock Chase Special Area of Conservation (SAC). Given the status of this European site and the potential adverse effects the plan could have on it, we strongly advise addressing this omission.

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	Natural England ( Hayley Pankhurst)
Comment ID	PS423
Response Date	28/02/13 12:00
Consultation Point	3.7 Paragraph ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy is Legally compliant?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**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.**

It is Natural England's view that the Duty to Co-operate & Cross border issues is both legally compliant and sound. However, we would like to recommend a minor amendment intended to ensure the Plan's compliance with European legislation and policy.

We welcome the commentary on the Cannock Chase AONB Partnership and the Habitat Regulations Assessment process. However, the reference to the Habitats Regulations Directive is incorrect, and we advise a minor amendment to replace the word "Directive" with the word "Assessment".

*3.9 A key cross border issue being addressed through joint working with other authorities and the Cannock Chase Area of Outstanding Natural Beauty (AONB) Partnership is on the Habitat Regulations **Assessment** for the Cannock Chase Special Area of Conservation (SAC) within the AONB. There are a number of pressures on the SAC from recreation, air quality and water abstraction which need to be considered as part of the new Plan for Stafford Borough and its strategy.*

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Natural England ( Hayley Pankhurst)
Comment ID	PS424
Response Date	28/02/13 12:00
Consultation Point	12.23 Paragraph ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.4

**Justified:** the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

**Do you consider that the Plan for Stafford Borough is Sound?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**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.**

Natural England welcomes the positive wording provided in the supporting text.

We recommend the following minor amendments, intended to correct errors and omissions and therefore improve the compliance with national policy. The references to Regionally Important Geological Sites (RIGS) in paragraph 12.25 and in Policy N5 are out of date; RIGS are now simply referred to as Local Geological Sites. In addition, the current position of the reference to geological sites in a sentence about the Boroughs biodiversity sites is not appropriate, and we suggest instead that there is a separate sentence about geodiversity.

We welcome paragraphs 12.26, 12.27 and 12.28, but suggest that the implied requirement to preserve, restore and recreate priority habitats and aid the recovery of priority species (as per NPPF paragraph 117) is made more explicit.

We suggest the inclusion of a reference to the Borough's Green Infrastructure Strategy, which sits as part of the evidence base for the LDF.



## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Natural England ( Hayley Pankhurst)
Comment ID	PS425
Response Date	28/02/13 12:00
Consultation Point	34 Policy N4 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3

**Justified:** the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

**Do you consider that the Plan for Stafford Borough is Sound?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**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.**

Natural England fully supports this policy. We recommend the inclusion of a reference to the Borough's Green Infrastructure Strategy.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Natural England ( Hayley Pankhurst)
Comment ID	PS426
Response Date	28/02/13 12:00
Consultation Point	37 Policy N7 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3

**Justified:** the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

**Do you consider that the Plan for Stafford Borough is Sound?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Natural England fully supports this policy

## Comments

### **The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)**

<b>Comment by</b>	Natural England ( Hayley Pankhurst)
<b>Comment ID</b>	PS427
<b>Response Date</b>	28/02/13 12:00
<b>Consultation Point</b>	38 Policy N8 ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	0.3

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Natural England fully supports this policy

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Natural England ( Hayley Pankhurst)
Comment ID	PS428
Response Date	28/02/13 12:00
Consultation Point	40 Policy I1 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**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.**

Natural England supports the inclusion of ?environmental infrastructure? within this policy, and we welcome the clarification in paragraphs 13.16 & 13.17 that this includes mitigation in relation to the identified potential adverse effects on Cannock Chase SAC.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Natural England ( Hayley Pankhurst)
Comment ID	PS429
Response Date	28/02/13 12:00
Consultation Point	15 Glossary ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**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.**

We recommend adding a definition of Suitable Alternative Natural Greenspace (SANGs).



**The Plan for Stafford Borough  
Pre-Submission Consultation**

**Ref:**

**Representations Form**

**(For official  
use only)**

**Please return completed forms to:**

- Head of Planning & Regeneration, Stafford Borough Council, Civic Centre, Riverside, Stafford, ST16 3AQ
- or by email to [forwardplanning@staffordbc.gov.uk](mailto:forwardplanning@staffordbc.gov.uk)
- or by fax to: 01785 619473

**Responses must be received by 12 noon on Thursday 28<sup>th</sup> February 2013**

**This form has two parts:**

**Part A:** Personal Details

**Part B:** Your representations.

- Please complete Part B of this form for each representation you wish to make. You do not need to complete Part A more than once, but please ensure you state your name or organisation as applicable at the top of each Part B form you submit.
- Please refer to the attached guidance notes on making representations so that they address issues of legal compliance and / or soundness.
- Please note that when representations are submitted only Part B of the form will be published. Contact details on Part A will not be published.

# Part A

## 1. Personal Details\*

\*If an agent is appointed please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

## 2. Agent's Details (if applicable)

Title	Mr	Mr
First Name	Rupert	Andrew
Last Name	Wood	Mann
Job Title (if applicable)		Senior Planner
Organisation (if applicable)	St. Modwen	Savills
Address Line 1		Wessex House
Address Line 2		Priors Walk
Address Line 3		Wimborne
Address Line 4		Dorset
Postcode		BH21 1PB
Telephone Number		01202 856948

E-mail address

amann@savills.com

**Part B – Please use a separate sheet for each representation**

Name or Organisation	St. Modwen
----------------------	------------

**3. What part of The Plan for Stafford Borough (including the Policies Maps document) does your comment relate to?**

e.g. Policy Reference, Paragraph, Map title	Sections 3 and 12 Policies I1 and E5
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*If your comment does not relate to a specific part of the document, or it relates to a different document, for example the Sustainability Appraisal, please make this clear in your response.*

**4. Do you consider that the Plan for Stafford Borough is:**

**a. Legally compliant\*?**

Yes  No

**b. Sound\*?**

Yes  No

*To check a box when completing this form electronically, double click on it and select 'checked' under default value.*

*\*Please refer to the attached note for guidance on legal requirements and soundness.*

*If you have entered **No** to Q4.b. please continue to Q5. In all other circumstances please go to Q6.*

**5. Do you consider The Plan for Stafford Borough is unsound because it is not:**

**a. Positively Prepared**

**b. Justified**

**c. Effective**

**d. Consistent with national policy**

**6. Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**



## **Positively prepared**

My client fully supports the provisions of Policy E5, in particular with reference to the Former Meaford Power Station site. This site is a large brownfield site which was formerly the Meaford power station and has consent for a significant volume of employment generating uses.

The plan does not reflect the national need for certain types of energy projects as set out in the National Policy Statements (NPSs). Paragraph 12.19 of the Plan refers to the Renewable Energy NPS, but no reference to other NPSs can be found in the Plan, which is considered to be inconsistent.

## **Consistent with national policy**

### *National Policy Statements*

The Plan for Stafford does not fully take account of Government policy for Nationally Significant Infrastructure Projects (NSIPs) as set out in the NPSs.

A letter was issued to Chief Planning Officers issued by the Department for Communities and Local Government (CLG) on 9 November 2009 describing the purpose of NPSs and their interaction with the Local Plan making process. Paragraph 14 of Annex A to that letter states:

*'NPSs are not part of the statutory development plan for the purposes of the town and country planning regime but are statements of national policy on nationally significant infrastructure. Regional planning bodies (or new style responsible regional authorities when in place) and local planning authorities (LPAs) must therefore have regard to NPSs when preparing their plans at regional and local level. Emerging policy in a published draft NPS may also be relevant.'*

Paragraph 3.4, and the subsequent text box, reiterates the Government's strategy for sustainable development. This includes a series of priorities, which are expanded upon where appropriate in the six National Policy Statements which have been designated relating to energy infrastructure projects. These National Policy Statements have not been referenced in Section 3 or fully referenced in the draft plan. The plan makes specific reference to the renewable energy NPS at paragraphs 12.19 and energy NPSs at paragraphs 12.14 and 12.22.

The plan is not, therefore, consistent with national policy.

**7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough legally compliant or sound, having regard to the test you have identified at question 5. You will need to say why this change will make the document legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

The Plan should set out the need for NSIPs recognising the policy contained within the NPSs. It is recommended that policies and supporting text should be revised to reflect the policy contained within the NPSs (additions shown in green text):

**12.14** Climate change is a key priority area for government at the national level, articulated through The Climate Change Act, 2008, which sets out a legally binding framework to reduce carbon emissions. Existing policy direction is provided by The UK Sustainable Development Strategy, 2005 and the Planning and Energy Act, 2008 as well as recently introduced National Planning Policy Statements (NPS). **The Overarching National Policy Statement for Energy (EN-1) sets out the need for new nationally significant electricity infrastructure projects at section 3.3, highlighting the benefits of a diverse mix of all types of energy generation. The Government is committed to the diversification and decarbonisation of electricity generation and confirms that the need for new renewable and other electricity generation is urgent. EN-1 also emphasises the importance of fossil fuel generation in enabling security of supply and responding to peaks in energy demand.** At the local level, the Council is seeking to fulfil its commitment under the Staffordshire Declaration on climate change to reduce carbon dioxide emissions in the Borough. To achieve this, the Plan for Stafford Borough will provide an effective platform that promotes resilience against climate change by implementing sustainable development, enhanced building design, increasing energy self sufficiency and minimising development in areas that flood.

**Policy I1 Infrastructure Delivery Policy**

**New Nationally Significant Infrastructure Projects (NSIPs) will be supported in line with the provisions of the relevant designated and draft National Policy Statements applicable to the proposal.**

New development that provides additional residential or commercial development will be supported by appropriate levels of physical, social and environmental infrastructure at a timely stage, as identified in the Infrastructure Delivery Plan.

The appropriate levels of contributions for infrastructure will be secured in a variety of ways, including the Community Infrastructure Levy (CIL) charging schedule, Section 106 agreements, and legal agreements to ensure new developments contribute to new and / or improved infrastructure and services (including community needs). In assessing such requirements, the viability of developments will also be considered when determining the extent and priority of development contributions.

9.21 There are also a number of significant brownfield sites located in the North Staffordshire Green Belt, known as Major Developed Sites. In order to encourage re-development of these areas for new employment provision, to support inward investment and job creation opportunities in the North Staffordshire conurbation, these are identified on the Proposals Map at Hadleigh Park (previously known as Creda / Indesit works), the former Meaford Power Station, and Moorfields Industrial Estate. **In assessing redevelopment proposals of the Former Meaford Power Station site the Council will relate the proposals to the previously existing development of the site.**

### **Policy E5 Major Employment Sites**

Major Developed Sites in the Green Belt

The following sites will be identified as previously developed sites (whether redundant or in continuing use, excluding temporary buildings) within the Green Belt, where limited infilling or the partial or complete redevelopment will be supported for employment **or infrastructure** purposes consistent with **relevant National Policy Statements, and** Spatial Principle SP7, which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development;

- Hadleigh Park (Former Creda Works Limited), Blythe Bridge.
- Moorfields Industrial Estate, Swynnerton.
- Former Meaford Power Station, Meaford, Stone.

***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**

**The Plan for Stafford Borough  
Pre-Submission Consultation**

**Representation Form Guidance Notes**



Representations made within the consultation period will be considered alongside The Plan for Stafford Borough: Submission as part of an examination by an independent planning inspector. The purpose of the examination is to establish whether the plan has been prepared in accordance with **legal requirements**, and whether it is **sound**.

**Representations should therefore focus on legal compliance and soundness.**

If you wish to make a comment seeking to change The Plan for Stafford Borough you should make clear in what way you consider it is not legally compliant or sound. You should try to support your comment by providing evidence and supporting information showing why it should be changed. It will be helpful if you also say precisely how you think it should be changed.

For the plan to be **legally compliant** it must:

- be prepared in accordance with:
  - the Council's Local Development Scheme (a timetable for plan preparation);
  - the Council's Statement of Community Involvement (which includes the Council's policy for community engagement on The Plan for Stafford Borough) and
  - relevant Acts and Regulations; in particular the Town and County Planning (Local Planning) (England) Regulations 2012;
- have been subject to sustainability appraisal;
- have regard to:
  - national policies, advice and guidance issued by the Secretary of State; and
  - the Stafford Borough Sustainable Community Strategy and Stafford Borough Community Action Plan;
- be in general conformity with the Regional Spatial Strategy for the West Midlands;
- meet legal requirements under the Duty to Co-operate (introduced via the Localism Act 2011).

**Soundness** is explained in the National Planning Policy Framework. For a plan to be sound it must be:

- **Positively prepared** - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements;
- **Justified** – the plan should be the most appropriate strategy based on a robust and credible evidence base;

- **Effective** – the plan should be deliverable over its period;
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

Where there are groups who share a common view on how they wish to see The Plan for Stafford Borough changed, it would be very helpful for that group to send a single comment rather than for a large number of individuals to send in separate comments which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Trentham Leisure Limited ( )
Comment ID	PS431
Response Date	27/02/13 17:46
Consultation Point	19 Policy E6 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.7

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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

We write in relation to the above on behalf of Trentham Leisure Limited (a subsidiary of St. Modwen Properties PLC), the freehold owner of The Trentham Estate and Gardens, as shown edged red on the attached plan. Trentham Leisure Limited welcomes the opportunity to be involved in the preparation of The Plan for Stafford Borough. Having reviewed the Pre-Submission Version of the document we would make the following comments. Please note that Trentham Gardens was rebranded following the grant of the Outline Planning Permission 97/35257/OUT as 'The Trentham Estate and Gardens' and we would ask that the whole Estate is referred to as such in the document. 'Trentham Gardens' is now only used to refer to the area of the restored gardens and not the whole Estate. Draft Policy E6 We welcome a Policy that supports growth in tourism within the Borough. The Trentham Estate and Gardens (hereafter referred to as 'the Estate') has now become one of the UK's premier tourist

destinations. The success of the Estate is an important accolade for the Borough and emerging planning policy needs to be flexible and responsive enough to allow appropriate development to support the continued restoration and regeneration of the Estate, which will maintain its status as a premier UK tourist attraction. In view of this, we support a policy that recognises the need to adopt a flexible and responsive approach to new appropriate development in such locations. **New Site-Specific Policy: The Trentham Estate and Gardens** We consider it is important to include a site-specific policy relating to The Trentham Estate and Gardens within The Plan for Stafford Borough to guide future development. The Estate is recognised as a very important Heritage, Tourist and Leisure asset which was rescued from dereliction through a major master planning and investment programme by Trentham Leisure Limited, embodied in the 2001 Outline Planning Permission. The master planning and investment programme secured the Estate's restoration / regeneration and long term financial sustainability. A site specific policy is essential to ensure that the principles established are protected to maintain the long term financial sustainability, without which the Estate could risk future decline. The master plan embodied in the 2001 Outline Permission envisaged a 10 year restoration and regeneration programme which commenced in November 2003 after grant of reserved matters approvals, but the programme has been delayed by the severe economic crisis since 2007/8.

Whilst much of the development granted under the 2001 Outline Planning Permission has come forward, significant elements are still to be completed, and there is a need to ensure the Estate remains a significant site in the Borough. It is important, therefore, that Stafford Borough's Development Plan recognises the established use, the extant permissions yet to be implemented and the need to complete the Estate that would positively encourage its continued use and restoration, as well as the contribution that it makes to the local economy. A number of the Estate's key future development objectives are detailed in the draft Trentham Conservation Area Appraisal (June 2012), which includes the restoration of a number of listed buildings. This includes Trentham Hall, which is on English Heritage's 'Buildings at Risk Register'; the Courtyard; and Park Drive Cottages. A site specific policy would provide a consistent and focussed approach to assist with the fulfilment of these objectives.

The primary purpose of a site-specific policy would be to recognise the unique and diverse needs of the Estate and ensure an appropriate balance is struck between the provision of any leisure, tourism or enabling development, that will ensure the continuing restoration of the Estate, against the need to safeguard existing heritage assets from inappropriate development. We consider Policy RLT19 of the adopted Stafford Borough Local Plan 2001 currently provides an effective mechanism for assessing development proposals as part of a holistic consideration of a number of completing and sometimes contradictory aims. Policy RLT19 (Accommodating New Development at Trentham Garden Estate) was saved following the Secretary of State's Direction dated 7th September 2007. The reason for including the Policy in the current Local Plan is set out in Paragraph 9.28.2 of the Inspector's Report, issued in January 2007, which states: ***"The estate is a significant leisure resource within the Borough and sub-region and over the last 50 years has developed a wide variety of visitor uses associated with recreation, leisure, conference, exhibition, banqueting and entertainment. The site is not currently meeting its full recreational potential and requires upgrading and improvement. It has potential for a wide range of leisure uses and expansion of its historic buildings, gardens and landscape"***. The fundamental objectives of the Estate remain the same as those considered when the current local plan policies were being formulated. These are to reinforce its status as a major tourism/leisure destination; preserve and enhance its significance as a heritage asset (Grade II Listed Historic Park and Garden/Conservation Area); and to support the objectives of the North Staffordshire Green Belt. Policy RLT19 enables development proposals to be assessed against a list of key criteria that recognise these key aims, and only when the local authority are satisfied that a 'balance of advantage' has been demonstrated as a result of this assessment, will the development be deemed appropriate. Paragraph 9.28.5 of the Inspector's Report confirms the policy 'provides a clearer basis for guiding development. It identifies the land use to which the estate is put and sets out a series of criteria against which the merits of any project can be assessed...'

In the absence of the above assessment, Trentham would be largely controlled by Policy N9 (Historic Environment), which has a heavy bias on 'enhancing the significant heritage assets and their setting by understanding the heritage interest, encouraging sustainable re-use and promoting high quality design'. Whilst Trentham Leisure Limited is supportive of the objectives underpinning the Policy, Policy N9 would limit the type of development proposals that could come forward at the Estate in the future and would not culminate in the balance of uses that are required for a continued economically and sustainable viable future for Trentham, particularly as the 2001 Outline Permission was tested at Public Inquiry. We would, therefore, advocate that any future site-specific policy is predicated on a similar



assessment to that provided in Policy RLT19. Subject to demonstrating a 'balance of advantage', saved Policy RLT20 (Appropriate Infill Uses at Trentham Estate and Gardens) of the adopted Stafford Borough Local Plan serves two important functions. Firstly, it defines an area, known as the 'northern core', within which limited appropriate development would be permitted subject to appropriate controls. During the preparation of the Adopted Local Plan there was agreement that the northern part of the Estate should be the focus of development and the Inspector, at Paragraph 9.28.7, confirms that 'this seems sensible as this is where most of the buildings and visitor attractions are already concentrated.' Whilst the Inspector acknowledges that the northern core includes key areas, such as the formal Italianate gardens between the lake and the remains of Trentham Hall, he states in Paragraph 9.28.9: **"Nonetheless, while the prospect of development over the whole of this area would have serious and adverse consequences, I consider its boundaries are reasonably well defined; the area is somewhat distinct from the less formal landscape beyond it. Great care would need to be taken to ensure that any development did not impinge upon what I regard as highly sensitive surrounds and I would not wish to countenance development on all the land within this area. Nonetheless, my view is that the area...is not excessive and the suggested policy is sufficiently robust to ensure that its distinctive and valuable qualities are safeguarded"**. We consider the concept of the northern core area still has relevance in terms of directing future development towards the most appropriate parts of the Estate and away from the more sensitive, open areas and ecological designations located to the south. It has been effective in ensuring the development proposals, granted as part of the 2001 Outline Planning Permission, are concentrated in less sensitive areas that were in need of regeneration. It also seeks to keep built development closer to the settlement boundary, prevents significant encroachment into the Green Belt and prevents unrestricted sprawl. We enclose a plan showing what we consider should be the extent of the northern core in the Local Plan for Stafford Borough.

The second part of Policy RLT20 prescribes uses that are appropriate within the northern core area. We consider that any site-specific policy would need to make it clear that other uses appropriate to the established and approved uses will be considered by the Council, particularly where they would enhance the Estate's position as a premier tourist attraction and assist in the restoration of deteriorating heritage assets. The Plan for Stafford Borough Draft Publication, which was consulted on between September and October 2011, included Development Management Policy 24 (New Development at Trentham Gardens Estate), which represented a site-specific policy for the Estate. This policy supported limited development and appropriate infilling within the northern area of the Estate for outdoor sport and recreation and a high quality hotel.

We have reviewed the responses received as part of the above consultation to understand why this site-specific policy has been removed from the latest version of the Plan currently being consulted on. There were no statutory, non-statutory or local resident' objections made to the inclusion of this site specific policy. The policy was supported by St. Modwen (as majority shareholder in Trentham Leisure Limited) and also English Heritage who requested that 'the policy content (and text) is expanded to clearly recognise the heritage significance of this area in terms of a Registered Park and Garden with numerous listed buildings and structures'. We could not find any reasons or evidence to support the exclusion of the Policy. We contacted Henry Lewis in Stafford Borough Council's Planning Policy Team on 20th February 2013, who explained they had discussed the need for a site specific policy with colleagues in Development Control who felt that Policies RLT19 and RLT20 were rarely used and should be removed. He stated that development proposals would be controlled through the broader topic-based policies proposed, such as Policies N8 (Landscape Character) and N9 (Historic Environment) and the NPPF in terms of Green Belt policy. We consider this justification for the removal of the site-specific policy is flawed, as the policy serves a purpose and should be retained to guide the management, restoration and regeneration of the Estate over the next Plan period.

Policy RLT19 acts as a prerequisite to Policy RLT20, and serves to assess the principle of development as we have described above. The fact that it has been used infrequently over the last decade is not a basis to remove the policy, as it still has a function and role in guiding the future of this important asset. It has not been applied recently due to the scale & comprehensive masterplan proposals approved through the 2001 Outline Planning Permission. Since then, a number of Reserved Matters applications have been approved, although these relate to issues of scale, layout, external appearance, landscaping and access only. Therefore Policies RLT19 and RLT20 were not applicable to their determination as the principle of development had already been established through the Outline Permission.

The Inspector's Report for Outline Planning Permission 97/35257/OUT dated 22nd June 2001, confirms that Policies RLT19 and RLT20 were central to its determination and the assessment provided in RLT19 was instrumental in the Inspector's decision making process. In Paragraphs 4.8- 4.9, the Inspector states:

**"It was with a view to arresting and reversing decline that the Council included Policies RLT19 and RLT20 in SBLP. The Council acknowledged in Paragraph 6.8.1 that the intended development would comprise 'major' recreation, tourism and leisure proposals. Paragraph 6.8.6 also addresses the important issues of conservation of the historic buildings and natural environment. It is within that context that SBLP Policies RLT19 and RLT20 are set to provide the basis for assessment of this application".**

Paragraph 154 of the NPPF confirms that Local Plans should address the implications of economic, social and environmental change and that Plans 'should set out opportunities for development and clear policies on what will or will not be permitted and where'. This supports the case for a sitespecific policy to recognise the need for ongoing management, restoration and regeneration of The Trentham Estate and Gardens. For example, the Courtyard remains empty and Trentham Hall has not been reinstated. This is further supported through Paragraph 157 of the NPPF, which confirms Local Plans should, inter alia, 'contain a clear strategy for enhancing the natural, built and historic environment...'

**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.**

Based on the above and the progress made so far on the Estate, an updated Policy RTL19 would provide an effective guide and framework for the determination of future proposals at the Estate. The Outline Permission expired in November 2012 and, as a result, the principle of any new development proposals at the Estate would need to be re-assessed and there is a need for an effective site specific mechanism within the Local Plan to enable this to occur. There are elements of the 2001 Outline Permission that have not been progressed, largely due to the current economic climate, and we would welcome a policy that recognises Trentham Leisure Limited's aspirations and commitment to manage, restore and regenerate the Estate. We would, therefore, propose the following policy, based on RLT19 and RTL20 but more so Development Management Policy 24 in the Plan for Stafford Borough Draft Publication version published in September 2011.

**"New Development at the Trentham Estate and Gardens"** The Trentham Estate and Gardens is a recreation, leisure, tourism and visitor attraction. Limited development and appropriate infilling will be permitted within the northern area of the estate (as defined on the Plan in Appendix H) for the following range of uses:-

? Outdoor sport and recreation ? Indoor leisure and entertainment facilities ? Hotel-Conference Centre ? Exhibition facilities ? Heritage/recreation/craft related retailing ? Visitor facilities ? Justified enabling development.

Development at the Trentham Estate and Gardens must meet the following criteria:

- a) Conserve the natural and historic environment including existing buildings, gardens, landscape, flora and fauna;
- b) Enhance recreation / leisure facilities within the Borough;
- c) Limit the impact on the highway network;
- d) Meet the principles and objectives of the Green Belt".

*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

**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**

To expand on our representations and be able to discuss these issues in more detail with the Council.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Trentham Leisure Limited ( )
Comment ID	PS432
Response Date	27/02/13 17:46
Consultation Point	38 Policy N8 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.9

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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

We welcome a policy that recognises the protection and conservation of Registered Parks and Gardens such as The Trentham Estate and Gardens. However, we consider the policy is too stringent in its current form and does not reflect the guidance set out in Section 11 'Conserving and Enhancing the Natural Environment' of the NPPF. Paragraph 116 of the NPPF states that planning permission for major development in designated landscape areas should be refused, 'except in exceptional circumstances and where it can be demonstrated they are in the public interest.' This should include an assessment of the need for development; the cost of, and scope for, developing outside the designated area; and any detrimental effect on the environment, the landscape and recreational opportunities. We do not consider Policy N9 makes any provision for this assessment and is inflexible in its current form.

*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

**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**

To expand on our representations and be able to discuss these issues in more detail with the Council.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Trentham Leisure Limited ( )
Comment ID	PS433
Response Date	27/02/13 17:56
Consultation Point	39 Policy N9 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.6

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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

We are supportive of a policy that recognises the importance of safeguarding important heritage assets in Stafford, but we do not consider Policy N9 provides the scope to enable a balanced assessment of potential proposals at The Trentham Estate and Gardens in line with national planning policy. Paragraph 134 of the NPPF in Section 12 'Conserving and Enhancing the Historic Environment' states that where a development leads to less than substantial harm to a designated heritage asset, it 'should be weighed against the public benefits of the proposal, including securing its optimum viable use.' Paragraph 140 goes on to state that: "Local Planning Authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies."

We consider this reinforces the need for a site-specific policy relating to The Trentham Estate and Gardens as Policy N9 is restrictive in its current form and does not provide a suitable policy basis within which the needs of the Estate can be brought forward and realised. Providing this flexibility is,

in itself, an important part of ensuring the ongoing management, restoration and regeneration of the Estate.

*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

**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**

To expand on our representations and be able to discuss these issues in more detail with the Council.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Trentham Leisure Limited ( )
Comment ID	PS434
Response Date	27/02/13 17:46
Consultation Point	28 Policy C5 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.7

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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

We would recommend that Policy C5 (Residential Proposals outside the Settlement Hierarchy) Part A: New Development is amended to include an opportunity for appropriate infilling within the Green Belt in line with Paragraph 89 of the NPPF. This confirms that 'limited infilling in villages' and 'limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and purposes of including land within it than the existing development', are exceptions to inappropriate development. We consider appropriate infilling relates to vacant plots within existing settlements, including those within the Green Belt, where the surrounding character of the area would make it appropriate for suitable infill development to take place. Currently there is no provision for this in Policy C5 and we would expect any infill sites to be assessed against impact on openness as well as the five purposes of the Green Belt and a consideration of whether it fulfils any of the Green Belt objectives. The benefit of developing appropriate infill sites, particularly



those with a previously developed character is that it would relieve pressure from developing potentially more sensitive greenfield sites. This approach is supported by the NPPF, and is a positive outcome that should be actively pursued by the local authority.

**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.**

We would propose that Part A of Policy C5 is amended as follows: "A. New Development In areas outside of Settlement Boundaries, as defined in Spatial Principle SP7, proposals for new residential development will need to meet the criteria listed in SP7, together with all of the following criteria: 1. It is demonstrated that provision cannot be accommodated within the Settlement Hierarchy (Spatial Principle SP3); 2. The housing is justified by a Parish based Local Housing Needs Assessment, and an appraisal of the scheme, proving that it will meet the defined needs, shall accompany any planning application; 3. The development is of a high quality design that reflects the setting, form and character of the locality and the surrounding landscape; In addition to the above, the following development will also be acceptable: a) appropriate limited infilling within villages and settlements in the Green Belt; and, b) appropriate limited infilling or the partial or complete redevelopment of previously developed sites in the Green Belt provided that it would not have a greater impact on the openness of the Green Belt and purposes of including land within the Green Belt than any existing development".

*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

**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**

To expand on our representations and be able to discuss these issues in more detail with the Council.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr A Christelow
Comment ID	PS435
Response Date	28/02/13 09:31
Consultation Point	8 POLICY STAFFORD 1 ? STAFFORD TOWN ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.5

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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Justified

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The policy states: "The use of employment sites for employment purposes other than B1 (b & c) excluding offices (B1a), B2 and B8 will not be permitted unless it can be proved that the proposed use cannot be located within Stafford town centre." The effect of this policy would be to exclude any waste uses from employment sites as they do not fall into the use classes listed, but are categorised as *sui generis*. This would conflict with the Staffordshire and Stoke-on-Trent Joint Waste Local Plan which has been found sound and is due to be considered for adoption by the councils in March. In Policy 2.3, it identifies Stafford as a suitable location for new waste management facilities of local or sub-regional scale, and existing industrial estates and employment land as the preferred location for such facilities, subject to a comprehensive range of checks (set out in Policies 3.1, 4.1 and 4.2) to ensure compatibility with existing uses. Waste management facilities would generally have no problem demonstrating that they could not be located in Stafford town centre, so they would pass the exception

test proposed by the Borough Council, but the policy remains in conflict with the Joint Waste Local Plan.

**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 problem could be overcome by the insertion of additional wording into the policy as below: "The use of employment sites for employment purposes other than B1 (b & c) excluding offices (B1a), B2 and B8; or similar, compatible waste management uses will not be permitted unless it can be proved that the proposed use cannot be located within Stafford town centre."

*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

**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 issue is directly related to Staffordshire County Council's role as Waste Planning Authority. Should Stafford Borough Council not be minded to make the suggested amendment, or something of similar effect, we would be happy to appear at the examination to argue the case if the Inspector considers this appropriate.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr A Christelow
Comment ID	PS436
Response Date	28/02/13 09:31
Consultation Point	12 POLICY STONE 1 ? STONE TOWN ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3

**Justified:** the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

**Do you consider that the Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Justified

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The policy states that: "The use of employment sites for employment purposes other than B1 (b & c) excluding offices, B2 and B8 will not be permitted unless it can be proven to the Council that the proposed use cannot be located within Stone town centre. The effect of this policy would be to exclude any waste uses from employment sites as they do not fall into the use classes listed, but are categorised as *sui generis* . This would conflict with the Staffordshire and Stoke-on-Trent Joint Waste Local Plan which has been found sound and is due to be considered for adoption by the councils in March. In Policy 2.3, it identifies Stone as a suitable location for the development of new waste management facilities of a local scale, and existing industrial estates and employment land as the preferred location for such facilities, subject to a comprehensive range of checks (set out in Policies 3.1, 4.1 and 4.2) to ensure compatibility with existing uses. Waste management facilities would generally have no problem demonstrating that they could not be located in Stone town centre, so they would pass the exception test proposed by the Borough Council, but the policy remains in conflict with the Joint Waste Local Plan.

**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 problem could be overcome by the insertion of additional wording into the policy as below: "The use of employment sites for employment purposes other than B1 (b & c) excluding offices, B2 and B8; **or similar, compatible waste management uses** will not be permitted unless it can be proven to the Council that the proposed use cannot be located within Stone town centre.

*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

**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 issue is directly related to Staffordshire County Council's role as Waste Planning Authority. Should Stafford Borough Council not be minded to make the suggested amendment, or something of similar effect, we would be happy to appear at the examination to argue the case if the Inspector considers this appropriate.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr A Christelow
Comment ID	PS437
Response Date	28/02/13 09:31
Consultation Point	16 Policy E3 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** Justified

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The policy identifies Recognised Industrial Estates and states that: "Within the Recognised Industrial Estates the following appropriate economic uses will be permitted provided there are no significant adverse impacts on the surrounding environment, nearby residents or transport networks: a. "Light industrial (B1) excluding B1 offices, general industrial (B2), and storage and distribution (B8); b. "A limited element of retailing where this is ancillary to another main use under (a); c. "Services, facilities and works specifically provided for the benefit of businesses based on, or workers employed within, the Recognised Industrial Estate; d. Other employment-generating uses to enhance inward investment, such as those related to recreation and tourism, which meet local needs and / or promote the rural economy." The effect of this policy would be to exclude any waste uses from Recognised Industrial Estates as they do not fall into the use classes listed, but are categorised as *sui generis* . This would conflict with the Staffordshire and Stoke-on-Trent Joint Waste Local Plan which has been found sound and is due to be considered for adoption by the councils in March. In Policy 2.3, it identifies existing

industrial estates and employment land as the preferred location for new waste management facilities, subject to a comprehensive range of checks (set out on Policies 3.1, 4.1 and 4.2) to ensure compatibility with existing uses.

**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 problem could be overcome by the insertion of additional wording into the policy as below: "Within the Recognised Industrial Estates the following appropriate economic uses will be permitted provided there are no significant adverse impacts on the surrounding environment, nearby residents or transport networks: "a. Light industrial (B1) excluding B1 offices, general industrial (B2), and storage and distribution (B8), **or similar and compatible waste management uses**". It would also be necessary to make an amendment to paragraph 9.14 of the explanatory text: "Favourable consideration will be given to proposals in these areas for employment uses (Class B uses of the Use Class Order, (excluding B1 offices) or **suitable and comparable waste management uses** ) subject to the existing character of the industrial area and other factors."

*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

**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 issue is directly related to Staffordshire County Council's role as Waste Planning Authority. Should Stafford Borough Council not be minded to make the suggested amendment, or something of similar effect, we would be happy to appear at the examination to argue the case if the Inspector considers this appropriate.

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	Mr A Christelow
Comment ID	PS438
Response Date	01/03/13 09:31
Consultation Point	The Plan for Stafford Borough - Publication ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

**The Plan makes no mention of the need to safeguard mineral resources from sterilisation by other forms of development.** The requirement to do this is set out in paragraph 144, bullet point 7, of the National Planning Policy Framework (NPPF) which states that: "When determining planning applications, local planning authorities should:... ? not normally permit other development proposals in mineral safeguarding areas where they might constrain potential future use for these purposes;" Whilst the Minerals Planning Authority is yet to define Minerals Safeguarding Areas, these will be set out in emerging policy. A suitable reference within each District Council Local Plan would help to ensure that safeguarding can be achieved.



**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.**

This issue, together with a second safeguarding issues described on a separate sheet, could be remedied by inserting additional text to Spatial Principal 7 (SP7) - Supporting the Location of New Development. On page 33, between sections (iii) and (iv), a new numbered point might be inserted to read: "It will not lead to the sterilisation of significant mineral resources, or compromise the continued operation or expansion of any existing waste management facilities."

*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

**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 issue is directly related to Staffordshire County Council's role as Minerals Planning Authority. Should Stafford Borough Council not be minded to make the suggested amendment, or something of similar effect, we would be happy to appear at the examination to argue the case if the Inspector considers this appropriate

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr A Christelow
Comment ID	PS439
Response Date	27/02/13 09:31
Consultation Point	The Plan for Stafford Borough - Publication ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Justified  
. Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

**The Plan makes no mention of the need to safeguard existing waste management facilities from constraint by other forms of development in their vicinity.** Paragraph 33 of PPS 10, which remains in force, states that: "In determining planning applications, all planning authorities should, where relevant, consider the likely impact of proposed, non-waste related, development on existing waste management facilities, and on sites and areas allocated for waste management. Where proposals would prejudice the implementation of the waste strategy in the development plan, consideration should be given to how they could be amended to make them acceptable or, where this is not practicable, to refusing planning permission."

**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.**

This issue, together with a second safeguarding issue described on a separate sheet, could be remedied by inserting additional text to Spatial Principal 7 (SP7) - Supporting the Location of New Development. On page 33, between sections (iii) and (iv), a new numbered point might be inserted to read: "It will not lead to the sterilisation of significant mineral resources, or compromise the continued operation or expansion of any existing waste management facilities." Also on page 34, a new section should be added between sections i) and J) to read: "will not compromise the continuation of any existing lawful uses ." Note that this objection would be satisfied by a specific reference to the continuation of existing waste management operations, but the more general phrase proposed seemed to have the potential to be more acceptable within the aims of the overall 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

**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 issue is directly related to Staffordshire County Council's role as Waste Planning Authority. Should Stafford Borough Council not be minded to make the suggested amendment, or something of similar effect, we would be happy to appear at the examination to argue the case if the Inspector considers this appropriate.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Staffordshire County Council - Transport (Mr Nick Dawson)
Comment ID	PS440
Response Date	28/02/13 09:30
Consultation Point	11 POLICY STAFFORD 4 ? EAST OF STAFFORD ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The County Council will support the soundness of The Plan for Stafford Borough if the modifications recommended under Q7 are made to Policy Stafford 4 to ensure the plan is effective, factually correct and clear in terms of infrastructure requirements.

The Stafford Borough Integrated Transport Strategy produced by the County Council is reviewed annually and will be updated to reflect the outcome of the emerging Local Plan.

**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 clarity and accuracy, it should be stated that the Eastern Access Improvements is more than 'one scheme' as it includes a package of complementary sustainable transport measures and highway infrastructure, including Phase 1 of the Eastern Distributor Road between Beaconside and St. Thomas Lane. The policy needs to be improved to ensure clarity with regard to what highway and transport improvements are proposed and what the developer is required to fund. The following paragraph is therefore required which replaces and combines xv, xvii and elements of xiv. It would fit under either the Transport or Infrastructure sub-section. The Eastern Access Improvements is a package of complementary sustainable transport measures and highway infrastructure to be funded through a combination of public funds and developer contributions. Developers in the East of Stafford will be required to provide phase 1 of the Eastern Distributor Road between Beaconside and St. Thomas Lane, sustainable transport access, potential highway capacity improvements at A518/Blackheath junction and the A518/A513 Beaconside junction and potential traffic management measures along Beaconside and Weston Road. Public funds will contribute towards further sustainable transport measures including the Baswich Walking and Cycling route between Baswich Lane and Weston Road, bus service enhancements, including real time bus passenger information, and potential highway capacity improvements along Baswich Lane.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Staffordshire County Council - Transport (Mr Nick Dawson)
Comment ID	PS441
Response Date	28/02/13 09:31
Consultation Point	10.5 Paragraph ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3

**Justified:** the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

**Do you consider that the Plan for Stafford Borough is Sound?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The County Council will support the soundness of The Plan for Stafford Borough if the modifications recommended under Q7 are made to Paragraph 10.5 to ensure the plan is effective, factually correct and clear in terms of infrastructure requirements. The inclusion of Staffordshire County Council's historically protected routes on the Policies Map is unexplained and confusing as it does not complement the policies in the emerging Local Plan. It is also confusing because it only includes a selection of the County Council's protected routes. Instead, the Policies Map should include the key infrastructure that is required to deliver the emerging Local Plan. It is Staffordshire County Council policy, as set out in a Report to the County Council's Executive in October 2002, that the protection of a number of major highway schemes should be, 'reviewed following Local Plan reviews, resolutions of planning applications and other consultation exercises currently planned'. In light of this, the schemes protected by the County Council within Stafford Borough will be reviewed in line with emerging Local Plan. Going forward, it is expected that protection of any scheme that is not required to deliver the Local Plan will be abandoned by the County Council unless there is evidence that protection is still required to meet possible future aspirations beyond the plan period.

**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.**

Delete: 'Staffordshire County Council currently identifies a number of protected routes within Stafford Borough as shown on the Policies Map'. Amend the Policies Map to reflect the key infrastructure required to deliver The Plan for Stafford Borough.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Staffordshire County Council - Transport (Mr Nick Dawson)
Comment ID	PS442
Response Date	28/02/13 09:31
Consultation Point	13.24 Paragraph ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The County Council will support the soundness of The Plan for Stafford Borough if the modifications recommended under Q7 are made to Paragraph 13.24 to ensure the plan is effective, factually correct and clear in terms of infrastructure requirements. It is unclear how the costs for 'critical' infrastructure have been identified so the County Council cannot confirm whether they are correct current estimates. Forecast costs for highway infrastructure and transport measures are not constant and would require an annual review so should therefore only be quoted within the supporting Infrastructure Plan

**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.**

Delete the costs quoted in paragraph 13.24 that relate to highway, pedestrian and cycling infrastructure.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Staffordshire County Council - Transport (Mr Nick Dawson)
Comment ID	PS443
Response Date	28/02/13 09:31
Consultation Point	8 POLICY STAFFORD 1 ? STAFFORD TOWN ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The County Council will support the soundness of The Plan for Stafford Borough if the modifications recommended under Q7 are made to Policy Stafford 1 to ensure the plan is effective, factually correct and clear in terms of infrastructure requirements. The Stafford Borough Integrated Transport Strategy produced by the County Council is reviewed annually and will be updated to reflect the outcome of the emerging Local Plan.

**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 Eastern Access Improvements is a package of complementary sustainable transport and highway infrastructure, including phase 1 of the Eastern Distributor Road between Beaconside and St Thomas Lane. For clarity and accuracy, 'Phase 1 of the Eastern Distributor Road from Weston Road / Beaconside to Baswich Lane road bridge at St Thomas' should be replaced in bullet point iic (housing), with 'Eastern Distributor Road from Beaconside to St. Thomas Lane'. Under bullet point ii (Infrastructure), 'Phase 1 of the Eastern Distributor Road from Weston Road / Beaconside to Baswich Lane road bridge at St Thomas' should be replaced with 'Eastern Access Improvements'. This change should be reflected throughout the document. For clarity and accuracy, it should also be explained that the full Western Access Improvements includes the Western Access Route between Martin Drive and A34 Foregate Street. This full route is required to deliver all development in Stafford Town including housing, employment and town centre redevelopment. Similarly, the Western Access Improvements and Northern Access Improvements are packages of measures rather than 'one scheme' which should also be reflected throughout the Plan.

*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

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	School Organisation ( )
Comment ID	PS444
Response Date	01/03/13 09:31
Consultation Point	13.15 Paragraph ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.5

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.**

13.15; Appendix D The County Council will support the soundness of The Plan for Stafford Borough if the modifications recommended under Q7 are made. The phasing of the delivery of new primary school facilities is unclear. It may be likely that new primary school/s will be required in the short term (years 1-5 of the plan). Delivery of new school/s on the Strategic Sites is likely to be required at the in the initial phases of the site. Whilst existing schools may be expanded it needs to be clear that this will only occur where it is possible and practical to do so.

**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.**

Paragraph 13.15 should be changed to the below: 13.15 Staffordshire County Council (SCC) has advised that it will consider specific needs of Strategic Development Locations on an individual basis. In the short term (Years 1-5 of the Plan for Stafford Borough), the strategy is focussed on increasing capacity in existing schools **where possible** . SCC confirm that where there is demand, modest alterations to existing schools, such as new classrooms, pupil space and toilets, will be developed **where appropriate** . Over the medium term (5 year plus), the The County Council has identified the need for additional primary schools to serve each of the SDLs, and that this provision will need to be allowed for within the masterplan frameworks developed for each **and phased accordinly** . There is more uncertainty about the form of provision of additional secondary education in Stafford Town, as the expansion of existing schools will, in most cases, require land acquisition. The provision of a new secondary school has not been ruled out in the medium term. Appendix D Should be changed as follows: Page 151 (Stafford North requirements) delete sentence in 2 nd column 'Initial Phase of development accommodated through extension to existing schools. On the same row 3 rd column delete dates and replace with 2011+ only. Page 153 (Stafford West requirements) delete sentence in 2 nd column 'Initial Phase of development accommodated through extension to existing schools'. On the same row 3 rd column delete dates and replace with 2011+ only.

*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

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Staffordshire County Council Economic Planning & Prosperity ( Darryl Evers)
Comment ID	PS445
Response Date	28/02/13 09:31
Consultation Point	The Plan for Stafford Borough - Publication ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.5

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Thank you for consulting Staffordshire County Council on the Plan for Stafford Borough - Publication (pre-submission documents). This clearly reflects the good working relationship between our two organisations, which has resulted in an ambitious and credible strategy. We recognise how advanced the Local Plan is and seek to work with you to ensure its future deliverability and affordability.

The County Council is committed to continue to work with Stafford Borough Council to deliver the Local Plan and to shape the Site Specific Allocations and master planning documents. We recognise that the Infrastructure Delivery Plan will continue to evolve over time and we are pleased to continue to work together to ensure the Local Plan is affordable and deliverable so that both our organisations can give it the endorsement that the Central Government Department for Communities and Local Government is expecting.

Staffordshire County Council has remodelled its operations: with the creation of Place we have transformed the traditional departmental approach into a single, interconnected operation where everything now pins into achieving long term economic prosperity. We call our model The Prosperity Wheel and we have organised our operations around eight themes. We welcome the opportunity to take a different approach to supporting an overarching spatial plan for Stafford that ensures a holistic consideration of the strategic direction, deliverability and affordability of the Local Plan. We've used each of the elements of the Prosperity Wheel in responding to the Local Plan for Stafford as set out in detail within the attached responses in accordance with your representation form and guidance notes. Our response makes a number of detailed comments including a number of statements of support, the key areas for further co-operation and a number of relatively minor suggested amendments.

A summary of our response is provided below for ease of reference: We commend the provision of 160 hectares of employment land development over the Plan period (2011-2031) with a target delivery

of 8 hectares per year. Of the 160 hectares of employment requirements 66.22 hectares was committed as of 31/3/2012. We support the planned distribution of employment provision with the main focus (56%) around Stafford Town to support the growth in housing. We recognise that you have planned for flexibility in your approach to rebalance the economic base away from public sector employment to more private sector employment and acknowledge the aspiration to facilitate growth in new, high technology areas. We support Policy E1 in promoting Stafford Borough as a location for new business start-ups, new enterprise and incubator units, and Information Technology capacity sectors. We also agree that in order to facilitate the transformation of the economic base it will be necessary to adapt current practices and develop reskilling programmes as well as creating better links with Staffordshire University and Local Businesses to support specialist technology incubator units. We acknowledge that the Employment Land Review (January 2013) that forms the evidence base that underpins the Local Plan, provides a wide range of employment land options, and we look forward to supporting the Land Allocation process in due course and to assist (where appropriate) in bringing forward and marketing a mixed portfolio of new sites through the countywide inward investment service. We welcome the opportunity to develop a shared economic vision for Stafford to complement the Local Plan, particularly to attract the key sectors that we wish to promote at each of the strategic employment areas. As such we are bringing forward the Redhill Strategic employment site, construction of which began on the 14th January. Also we are supporting the Kingsmead development and working closely to secure the anchor tenants required. We agree with the importance attached to the high standards of design of buildings, streets and spaces in delivering the vision for the District and support policies that seek to achieve this (e.g. N1). In particular the key objective in the strategy for Stafford town centre to support and enhance its sense of place through implementation of high quality urban design, an attractive public realm and streetscape. In relation to 'clear streets' initiative whilst the county council has no direct control over the provision of off-street parking the county and districts need to work together to in order to ensure that on-street and off-street parking provision complement each other. The main focus of the plan appears to be on off-street parking provision and the opportunity for a more integrated approach to off-street and on-street parking would be welcomed. This may enable us to recognise the impact that developments have on the pattern of demand for on-street parking and changing driver behaviour as a result.

A more integrated approach to parking may avoid or, reduce the impact of development and used in the right way can contribute to achieving 'Clear Streets' but also, provide highway users with a wider choice of parking and potentially facilitate the growth of the local economy in town centres by taking out parking restrictions where patterns of demand change as a result of developments. The transport & connectivity aspirations of the Local Plan is the first of the two most significant areas where Staffordshire County Council will need to work closely with the Local Planning Authority on securing significant investment funds and prioritising our joint investment choices. In particular, we are committed to working closely with the Local Planning Authority, developers and the Highways Agency to provide a wide range of schemes included in the Stafford Borough Integrated Transport Strategy. These include a wide range of public transport measures, walking and cycle improvements, promoting travel choices, junction improvements and new road links. The challenge will also be to secure funds for the delivery of Stafford Northern Access Improvements in the vicinity of Redhill that will support key housing and regeneration sites. In the long term, a main challenge will be to deliver the Stafford Western Access Improvements and associated sustainable transport and traffic management measures for the town centre. The Stafford Eastern Access Improvements will be required to support potential housing and employment development including phase 1 of the Eastern Distributor Road, additional highway capacity, traffic management measures, junction improvements and enhanced pedestrian and cycling links to local facilities and schools. We support the Infrastructure Delivery Plan in that the strategy seeks to identify potential sources of funding. The delivery of the Local Plan will require commitment from local authorities and infrastructure providers to secure funding for the infrastructure from a combination of developer contributions (e.g. S106, S278 and Community Infrastructure Levy), Central Government direct grants or via Local Enterprise Partnership schemes to unlock difficult or stalled developments (e.g. DCLG Growing Places Fund, DfT devolution of funding for local authority major transport schemes via a Local Transport Board, Pinch Point Funding, etc), core funding grants (e.g. New Homes Bonus, Local Transport Plan funding) The learning & skills implications associated with the Local Plan is the second of the two most significant areas where Staffordshire County Council will need to work closely with the Local Planning Authority on securing land, significant investment funds and prioritising our joint investment choices. The allocation of 10,000 new households will require new infrastructure in the form of nursery, primary, secondary and sixth form education provision. In particular, we are committed to working closely with the Local Planning Authority to masterplan the Strategic

housing allocation sites. The North and West Stafford sites make provision for new School facilities on-site. We have been able to estimate that at an investment of at least 44 Million will be required to deliver primary and secondary education provision to support the Local Plan. Depending on where the other housing allocations are made the infrastructure requirement will comprise (i) Expansion and changes to the infrastructure of existing schools; (ii) Additional land to expand an existing school beyond its current boundary; (iii) Relocation and expansion of current schools onto new sites; or (iv) Additional land and building for new schools. We are working closely with Stafford Borough to refine this advice in terms of existing and future education provision for Stafford Borough, including the costs and delivery mechanisms for new education provision as part of the Plan for Stafford Borough. Staffordshire County Council acknowledges that the funding landscape for education infrastructure provision is difficult to define with any great degree of certainty. We are committed to work closely with Stafford Borough Council to maintain an up to date and relevant Infrastructure Delivery Plan to apportion funding commitments that is likely to comprise a mixture of the Academy programme related investment, developer contributions, government grants and core funding. In particular, we will need to agree a strategy for using Section 106 developer contributions for the strategic housing allocations and/or Community Infrastructure Levy applied to the smaller housing developments.

Staffordshire County Council acknowledges the evidence base that underpins the Local Plan and supports the policies within the Local Plan that are designed to deliver 10,000 houses for Stafford Borough. The support extends to the associated regeneration priority areas, affordable housing demand and housing types policies (Policies C1, C2 & C3) to ensure that we meet the identified need. In addition, we need to correct the current imbalance in the market and ensure that they are absolutely aligned to plans for local economic growth and to attract business across the sectors. Staffordshire County Council support the policies designed for the rebalancing of the housing market to address the affordable housing provision to ensure that the young are retained within the Town and that the ageing population are supported. We particularly welcome that the Local Plan is aligned with our Flexi Care Strategy that supports independent living and has specific mention to working with the County to secure new provision in Policy C3 - Specialist Housing. We also acknowledge the objective to deliver flexible and adaptable housing through the application of 'The Lifetime Homes Standard' allowing homes to become more functional and readily adaptable when necessary. We welcome the opportunity to work on the masterplan for the three Strategic Development Locations in Stafford and the West of Stone Strategic Development Location.

Aligning the development proposals will be important to ensure the viability and deliverability of your Local Plan. We acknowledge that planning authorities will often need to strike a balance between the policy requirements necessary to provide for sustainable development and the realities of economic viability. Given that the remaining housing outside the Strategic Development Locations will come from many relatively small developments it will be critical that consideration is given to the cumulative impact of the plan policies and the infrastructure requirements. We acknowledge that Policy I1 includes a requirement for all new development to provide contributions towards necessary infrastructure through S106 agreements, other Legal agreements and Community Infrastructure Levy (CIL). We look forward to shaping future proposals within the agreed principles of a collaborative approach. Staffordshire County Council acknowledges that the rural landscape forms the setting for the towns and villages in Stafford Borough. There has been ongoing consultation with Staffordshire County Council Environment Specialists team during Local Plan preparation. We commented on the Issues and Objectives paper in 2009, draft core policies in 2010 and on a plan draft in 2011. In addition there have been various consultations on strategic housing locations west and east of Stafford. We have also been involved in Cannock Chase SAC evidence base work since 2009. Staffordshire County Council support the local plan objective to protect, enhance and improve the Borough's natural environment, which will help ensure appropriate mitigation measures are put in place to protect the district's biodiversity assets from development and recreational activities. Stafford Borough is rich in heritage assets and we acknowledge the local plan objective to protect, conserve and enhance historic assets and their settings through Policy N9 - Historic Environment. A healthy workforce and safer communities are essential components of economic success which is why our county's health is so important to long term prosperity. The planning system has an important role in facilitating social interaction and as a tool in securing the long term wellbeing of our communities. We welcome the wide range of cross cutting initiatives throughout the Local Plan that seek to positively influence health and well-being through economic development, enhancing the green spaces, connectivity, housing, design, cultural and leisure/recreation offer. We support the policies that encourage healthy & safe lifestyles in particular Policy C7 - Open Space, Sport and Recreation and Policy N4 - The Natural Environment and Green



Infrastructure will help promote physical activity. The environment in which people reside has a real impact on how they live, work and interact with others, which can have an impact on health. We welcome that Policy N1 - Design is underpinned by the aspiration to create sustainable and well balanced communities that contribute positively to making places better for people. We acknowledge that the Strategic development locations at Stafford North and West are to make provision for health facilities in the land use mixes on site and that all new development will be required to make contributions to increased capacity at existing primary health care provision. We welcome the opportunity to continue to work with you in reuniting health with planning in order to create and maintain healthier homes and healthier communities. Staffordshire Libraries and Arts Service wish to support provision of a strong library service to the residents of Stafford, Stone and the wider Stafford Borough, contributing to health and well being, community cohesion, educational and skills attainment, economic prosperity and leisure through the provision of books and information; access to IT and support to get online; learning opportunities; social space and activities. Staffordshire County Council support Stafford Borough Council in its aspiration to build on the quality of its landscape and historic character and that the town centres will become the focus for investment in new shopping, leisure and cultural activities. In particular, we acknowledge policy designed to increase the attraction of Stafford Borough as a tourist destination through supporting and promoting the growth of tourist facilities and the provision of a greater variety of accommodation in line with the Destination Management Partnership Strategy to increase overnight visitor capacity and enabling longer tourist stays. We welcome that policy for Tourism (E6) is framed such that new tourism initiatives will be supported where they are of particular local relevance and can be sustained in the long term. We support the aspiration to encourage water-based recreation through the restoration and regeneration of the canal system across Stafford Borough and recognise the need for specific Policy (E7 Canal facilities and New Marinas) to support this objective. Staffordshire County Council welcomes that Stafford Borough Council policies are aligned with the Minerals Planning Authority and Waste Planning Authority, and, subject to minor amendment, is in conformance with the Joint Waste Local Plan.

We support policy that stipulates that all new development will be expected to incorporate Sustainable Drainage Systems (SUDS). Staffordshire County Council as the Local Lead Flood Authority promotes the use of Sustainable Drainage Systems as a way of managing surface and groundwater regimes. We welcome specific policy on climate change and that the Council is committed to tackling climate change through requiring all new development to contribute to reducing carbon emissions. In this respect we acknowledge the reference to Building Research Establishment Environmental Assessment Methods (BREEAM). With regards to the Examination in Public stage of the Local Plan process, should you need any support from Staffordshire County Council in providing written or oral evidence to demonstrate our commitment to the Local Plan, please do not hesitate to contact either myself or the District Commissioning Lead for Stafford. Otherwise, I look forward to making progress on relevant masterplans and supplementary planning documents together in due course.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	CPRE - Local Office (Mr P J D Goode)
Comment ID	PS446
Response Date	28/02/13 11:58
Consultation Point	3 Policy Influences (National and Local) ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**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.**

3.3/3.4 CPRE is aware of National Government's emphasis on "sustainability" as a keystone in national planning policies. Sustainability, as defined in the Brundtland declaration is reliant on the Principles and Priorities set out in 3.4. However, at bottom, sustainability is the ability to continue a given course of action indefinitely without environmental detriment. This aim is totally compromised by destruction of natural resources - air, land, water - of which the sterilisation of land (and therefore of food supplies) by building development is the most intransigent problem. 3.5/3.15/3.16/3.17 "Sustainable development" cannot therefore be delivered through the three r les outlined in 3.5 if it involves destruction of the very resource, land itself, and that is the consequence of "growth" to which the Borough has committed itself! "Development" is non-sustainable whatever its other attributes. CPRE suggests that the document should acknowledge this unpalatable truth, and devote its policies by whatever feasible means to mitigation, offsetting or minimising the detriment caused by its proposals.

*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

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	CPRE - Local Office (Mr P J D Goode)
Comment ID	PS447
Response Date	28/02/13 11:58
Consultation Point	4 Key Issues ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.5

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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**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.**

4.1 The key issue and challenge is the reconciliation of Development and Growth with Sustainability as discussed in Chapter 3. CPRE will comment briefly on the bullet points in 4.1, and develop these comments more fully (if necessary) in Chapter 6 - Development Strategy. a) Growth - all key issues stem from the choice of "growth" as an underlying basis for Stafford's future. b) Providing Affordable Homes - CPRE accepts this as a key issue; provision of affordable homes is only one part of the problem; integration within communities/accessibility to employment, services and social infrastructure/transport issues etc are all interlinked. c) Adapting to Local Demographic Change - CPRE accepts this, but sees positive implications in imaginative solutions. d) Sustaining The Attractive And Distinctive Quality Of The Natural And Built Environment - protection of the wider countryside and landscape, Stafford's finest heritage asset, seems to be omitted here but the loss of land from development is to be magnified by the consequent loss of landscape! Cannock Chase SAC exhibits problems - and solutions - upon which we comment later. e) Climate Change - CPRE sees the solution

- if there is to be one - in wider issues than those listed. Soil and water conservation in their wider aspects/building layouts and design/landscape and shelter planting are all to be considered. f) Access to Services and Reducing Need to Travel - CPRE also identifies this as a key issue, much in the terms used here. g) Providing Employment Opportunities that meet Local Needs, Concerns and Aspirations for a Diverse Local Economy - CPRE deals later with these issues arising from the Settlement Policy and f) above. Also the changes linked to present government measures re private sector -v- public sector employment. h) Regeneration Benefits - concern over changes in availability of services arising from commercial policy shifts, see f) and g) above.

*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

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	CPRE - Local Office (Mr P J D Goode)
Comment ID	PS448
Response Date	28/02/13 11:58
Consultation Point	5 Spatial Vision and Key Objectives ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**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.**

CPRE would have little quarrel with the generality of the Vision; how the Vision is to be achieved requires expansion (see Chapter 6, Development Strategy). Some questions immediately arise:- b) the indeterminate meaning of "high quality development" d) how to attract a range of facilities to a rural area e) "sensitively delivered renewable energy schemes" - including wind turbine arrays 400ft high? How to add "sensitivity" f) sustainable transport - eg PSVs - connecting rural settlements to services and employment - economics? practicality? g) "exceptionally high quality" i) growth point, advantages -v- disadvantages? j) high quality jobs - how to ensure? l) high quality housing - how to ensure? m) major town centre investment - in what? o) vibrant local economy - how? p) high quality residential (see l) above) q) village local needs - but travel/employment r) improved public transport t) diverse rural economy - will expanding food prices/agricultural incomes not provide regeneration? Cannock Chase SAC - policies to provide alternative public open space - where and how?

*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

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	CPRE - Local Office (Mr P J D Goode)
Comment ID	PS449
Response Date	28/02/13 11:58
Consultation Point	6.15 Paragraph ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**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.**

This section of the document 6.14 to 6.18, sets out comprehensively the factors affecting this critical calculation, only to conclude that the land requirements lie between 25 hectares and 166 hectares. Reliance on past trends seems wholly unreliable bearing in mind the limited timescale of the 6.17 diagram and the chequered pattern of industrial changes in Stafford during past years. Other considerations such as commuter travel patterns and detriment to adjoining local authorities' development and regeneration prospects also seem to be lacking in consideration. The labour supply approach to estimating future needs seems likely to yield a more credible figure in the light of the reasoning in 6.16, although we believe that 6.16 needs further expansion to the final sentence to back up its bald assertions. CPRE has cast severe doubts upon the growth strategy underlying the Local Plan, and its relationship to the over-arching issue of land conservation. We have further reservations, expanded later, upon the unfeasibility of infrastructure provision - notably roads - implicit in the growth targets. Employment land is one of the greater land-use demands, and similarly with its impact on



traffic patterns. In the light of these concerns and the pattern of future demand related to land supply, we advocate acceptance of the lower "labour supply" estimate, even though this itself would be higher than demand arising from a lower growth target. 6.18 seems to firmly attribute employment land growth to the larger overall Plan aspirations, despite the labour supply arguments. We would suggest, nonetheless, that an additional paragraph should be added which makes this conclusion strongly and puts the blame resolutely in this quarter for the additional land-take inherent.

*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

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	CPRE - Local Office (Mr P J D Goode)
Comment ID	PS450
Response Date	28/02/13 11:58
Consultation Point	2 SPATIAL PRINCIPLE 2 (SP2) ? STAFFORD BOROUGH HOUSING & EMPLOYMENT REQUIREMENTS ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**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.**

CPRE contests the basis put forward for housing growth. It considers the population growth an arbitrary figure chosen to justify the Borough as a "Growth Point" qualifying for governmental financial support. This is a dubious proposition, at best, considering the scale of infrastructure necessitated by that growth figure, notably on highway and traffic support (see CPRE comments in Chapter 10, Transport). It is notable that "Natural Growth" as defined in 6.12 represents only 30% of the total housing need, ie 150 houses annually, as apposed to the 500 figure adopted, with a consequent saving of about 2 square miles of agricultural land, most of it greenfield sites. NPPF requires that "local authorities should provide for locally-assessed requirements of their area" which supports CPRE's contention. Housing provision on the scale of the Local Plan represents an inducement for population movement away from the North Staffordshire and South Staffordshire conurbations and therefore basically conflicts

with the fundamental premise of the West Midlands RSS. This was to encourage the regeneration of these deprived areas, an aim which the current government still pursues with their support through Regional Growth Funds and City Deals. As a final point the Local Plan makes much, quite rightly, of retention of Stafford Borough's attractive environment. We would maintain that much of this attraction derives from its market and County Town characteristics and its close relationship with its adjacent and easily accessible countryside. This well-appreciated quality would be largely overwhelmed with development in the amounts contemplated and the road proposals necessitated by such expansion. We advocate that the Local Planning Authority should examine, visit and deliberate on the damaging results of town expansion of other similarly-sized towns.

*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

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	CPRE - Local Office (Mr P J D Goode)
Comment ID	PS451
Response Date	28/02/13 11:58
Consultation Point	1 SPATIAL PRINCIPLE 1 (SP1) - PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**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.**

CPRE has responded to this issue in 3.4-3.17. The conclusion reached is that development at the scale arbitrarily chosen is non-sustainable; and that the term "sustainable" requires more rigorous definition, acknowledging that in the final analysis "sustainability" equates to "survival", at least of humanity and society as we know it.

*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

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	CPRE - Local Office (Mr P J D Goode)
Comment ID	PS452
Response Date	28/02/13 11:58
Consultation Point	8 POLICY STAFFORD 1 ? STAFFORD TOWN ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.5

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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**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.**

CPRE comments on this section, especially regarding Housing and Employment are to be read in conjunctions with our foregoing criticisms on the Growth Strategy and Sustainability Issues affecting housing and employment targets. **Housing** i. Support ii a) North of Stafford - object on grounds that development extends beyond the town's natural limits defined by Beaconside and occupies the high ground beyond the landscape "bowl" with which the town is contained relatively unobtrusively. Development would therefore be prominent and intrusive over wide distances, and would substantially urbanise the countryside separating Stone and Stafford creating a disproportionate "ribbon development" along and on both sides of the A34. ii b) West of Stafford - CPRE would have reservations about the southern boundary of this area which we feel would obtrude too substantially into the existing green infrastructure, and the housing development north of Martin Drive which could more obviously be allowed as Mixed Use. There must be reservations also regarding access to this large 2200 house

development with the two access points on to Newport Road and Doxey Road leading directly to the town centre, and congestion points blocking further flows beyond. The Western Access Improvement Scheme would only be completed subsequent to the Plan Period. ii c) East of Stafford - CPRE has raised its concerns in the past regarding the Eastern Development Road (EDR). Whilst this may have some merits (subject to alignment) for cross-town communication, great emphasis has been placed publicly and locally on its putative role as a diversionary route following blockage of the M6. CPRE emphasises that in this eventuality the EDR would cause a total blockage also of all its junctions with the radial routes which it crosses, bringing all town traffic to a standstill. In its partially complete form (within the Plan Period) it would feed the Beaconside traffic flow direct to the virtual blockage points at St Thomas's Mill and the three tortuous river and canal crossings. Beyond there, Baswich Lane (a residential road) feeds into the Weeping Cross junction notorious for its traffic congestion backing up the two principal routes, A518 to Lichfield and A34 to Cannock. Traffic flows would be exacerbated by the residential allocations fed by this road. The EDR in its ultimate form would continue along Lichfield Road, then cutting through the "buffer strip" between Walton and the A34 at the Borough boundary. It seems self-evident that the intention is to complete this "ring road" to the A34, but the environmental consequences of thrusting the outer boundary of Stafford so close to Cannock Chase ANOB would be so dramatic and expensive as to be prohibitive. This dilemma seems to be wholly ignored in the Plan, and yet is an inevitable consequence of the current submission. Please see also CPRE's submission on Cannock Chase SAC. **Employment** iv, a) and b) Please see CPRE submission at 6.15. **Stafford Town Centre** Policies i to vii seem inevitably to lead to the question of what physical form such developments will take. This question has assumed an immediate urgency following recent permissions given for Morrisons supermarket at North Walls and Marks and Spencer development at South Walls. The consequence is seem to be distribution of major retail shopping along and accessed from the ring road, Queensway, and the traditional older town centre "hollowed out" and deprived of main shopping attractions. Stafford centre's principal drawback has always been the length of its shopping street inhibiting relaxed shopping, and this detraction is amplified by the removal of shopping outlets to the town centre periphery. Some considerable degree of imaginative lateral thinking seems to be needed to restore and augment retention of Greengate/Gaolgate's attractions. CPRE supports and advocates the suggestion put forward to "land trains" cross-connecting the supermarket "rim" and utilising the main street and their branches. Besides revitalising the central area and offering relief to footsore pedestrian shoppers, they would avoid the need for cars parked along the town centre's periphery to move around the ring road from supermarket to supermarket, would offer a seamless connection with PSV routes, and would themselves be an attraction for children accompanying their shopping parents. There may be other alternatives for drawing the town centre together; if so they should be tabled or outlined. CPRE deplores the possibility that Stafford's historic and trading character should be eroded by loss rather than gain of attractions. It could well be that suggestions such as CPRE submission could be embraced by v and vi in this section of the report or within the next sections, including Tourism. **Infrastructure** To CPRE it seems that the "Northern Access Improvement Scheme" is not fully illustrated or described in the document, and the "Western Access Improvement Scheme", referred here as to be delivered in full, is suggested only for part-implementation. CPRE has commented fully, adversely, on the consequences of only part-implementation of the Eastern Distributor Road. What is "wet-side", page 40? **Environment** See CPRE submission on Cannock Chase SAC.

*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

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	CPRE - Local Office (Mr P J D Goode)
Comment ID	PS453
Response Date	28/02/13 11:58
Consultation Point	9 POLICY STAFFORD 2 ? NORTH OF STAFFORD ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**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.**

CPRE has commented on these policies in 7, Housing (i) and under the heading Environment vi and Infrastructure xiv in Stafford 1 Stafford Town.

*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

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	CPRE - Local Office (Mr P J D Goode)
<b>Comment ID</b>	PS454
<b>Response Date</b>	01/03/13 11:58
<b>Consultation Point</b>	10 POLICY STAFFORD 3 ? WEST OF STAFFORD ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**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.**

CPRE has commented on policies affecting this area in 7, Housing.

*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

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	CPRE - Local Office (Mr P J D Goode)
Comment ID	PS455
Response Date	28/02/13 11:58
Consultation Point	11 POLICY STAFFORD 4 ? EAST OF STAFFORD ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**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.**

CPRE has commented on policies affecting this area in 7, Housing,

*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

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	CPRE - Local Office (Mr P J D Goode)
Comment ID	PS456
Response Date	28/02/13 11:58
Consultation Point	12 POLICY STONE 1 ? STONE TOWN ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.5

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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**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.**

CPRE has commented in Chapters 3, 4 and 5 in terms which strongly criticise the basic assumptions behind housing and employment growth for Stafford Borough. With that proviso our comments on this section are:-

**Housing** This allocation occupies high ground but it is noted that a) it is not intended for development until 2021, and b) a notation indicates that a green "buffer" strip would screen and soften its visible impact over a wider area if it included a substantial tree element. (There appears to be a discrepancy between the three map diagrams regarding the northern boundary which on the Key Diagram extends to the railway line). CPRE would have concerns regarding the traffic generated and the capacity of the crossing of the A34 to give adequate access to all the town facilities to the east. **Employment** There must be reservations regarding extension of the industrial area south of Stone having regard to the rising ground here exacerbating the site's prominence in the wider view, and extension of industry

along the A34 both south of Stone and north of Stafford reducing the countryside gap and urbanising the wider area. It may be that landscaping provision and dark colouring materials for the buildings would minimise these impacts. Ideally tree-planting should take place in advance of development to assist early screening. **Stone Town Centre** a) CPRE would suggest that it should be made clear that the "mixed use development at Westbridge Park" should be of a character that complements its open space and recreational "park" symbolism, thus conforming with the Plan's intention regarding the canal and riverside green valley strip. **Tourism and Environment** CPRE would have felt it advantageous to include mention of the town centre as a designation Conservation Area within the Policy section.

*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

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	CPRE - Local Office (Mr P J D Goode)
Comment ID	PS457
Response Date	01/03/13 11:58
Consultation Point	13 POLICY STONE 2 ? WEST & SOUTH OF STONE ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**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.**

No CPRE comments other than those under Housing and Employment in STONE TOWN 1.

*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

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	CPRE - Local Office (Mr P J D Goode)
Comment ID	PS458
Response Date	28/02/13 11:58
Consultation Point	9 Economy ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**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.**

With due regard for CPRE's views on the total growth of Stafford Borough's economy, CPRE would endorse this Chapter. We would ask for reconsideration of Policy E1 f) and E2 v); rural diversification is a policy now arguably outmoded by the change in fortunes of the farming and food sector likely to continue hopefully well into the future. This policy was always predicated on such diversification being consistent within normal agricultural activities, and not extending to other non-farming uses. **Policy E7 Canal Facilities and New Marinas** CPRE would like the interpretation of this Policy to be re-examined. " *Creating an active canal frontage*" is, we suggest, likely to lead to the proliferation of extensive stretches of boat moorings which is one of the least attractive and most damaging manifestation of recreational boating. CPRE would argue that an " *active canal frontage* " is the least attractive outcome to be sought, and inactive and wholly rural canalside scenery is that which recreational boaters most enjoy. Is there an inconsistency here with policies a) to h)? Policy E7 (5) should preferably vary in its wording to refer to "... safety and attractiveness of the existing road network".

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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

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	CPRE - Local Office (Mr P J D Goode)
Comment ID	PS459
Response Date	28/02/13 11:58
Consultation Point	10 Transport ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**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.**

CPRE has commented elsewhere on the inconsistency of the Settlement Policy introducing or increasing private car ownership and use, new residents to access facilities not available in local settlements. We suggest that Policies T1 and T2 should be re-examined against this unconsidered outcome. HS2 (High Speed Rail) is a notable omission. Although it has no connections with other transport modes within the County, its assimilation into the landscape is a major concern.

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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

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	CPRE - Local Office (Mr P J D Goode)
Comment ID	PS460
Response Date	28/02/13 11:58
Consultation Point	10 POLICY STAFFORD 3 ? WEST OF STAFFORD ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**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.**

CPRE has commented on the essential but ill-defined principle of "sustainability" which qualifies in NPPF every aspect of development. Pursuing these comments we have criticised the extent of the "growth" chosen by Stafford Borough Council as contrary to this basic principle and therefore as non-sustainable.

It is CPRE's contention that the Settlements Hierarchy is unsound in its response to conditions likely to arise during and after the Plan period. Response to climate change requires a carbon (CO<sub>2</sub>) reduction in the atmosphere of 80% by 2050. This, in its turn, implies a virtual abandonment of private car travel and reliance upon "sustainable" transport - trains/buses/cycling/walking. Such a policy is (hesitatingly) written into the Plan. Provision of public transport for scattered rural communities is suggested as economically infeasible at the frequencies and over the network needed to access the range of facilities

needed by modern households. Accessibility to employment and a range of job choices matching employees' skills, aptitudes and job satisfaction needs is impossible to secure by public transport required to service both scattered communities and equally dispersed employment locations. In short, travel needs fostered in the past by universal car ownership become unrealistic when applied to the settlements strategy proposed for growth in rural settlements. We would consider that this policy would bear hardest on the residents of affordable or social housing. By definition such households are those least able to afford increased travel costs, most reliant upon social and other services and access to a wide choice of affordable shopping. Whatever the attractions of rural living, they do not embrace affordability. It might be claimed that as regards access to employment opportunities there will be such possibilities provided by local "service industries". It is however "choice" of job opportunities that is important in fostering and utilising skills and talents, and that is only possible where a wide range of employment is available convenient to home. CPRE suggests that the "sustainable" settlement policy is contrary to its qualifying adjective. We concur with the conclusion of 6.20 that "issues of accessibility remain in some rural areas", but regard this as a grievous understatement. From 6.25 to 6.36 it is apparent that the "retail and community facilities" available in most settlements is rudimentary at best and cannot offer the quality of life implicit in planning for the future. It would be a hard but just judgement that the sustainable settlements policy is fatally flawed, especially when considered against the acknowledgment in 6.40 that new development will extend the limits of built-up areas and consequently involve exclusively "greenfield" sites.

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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

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	CPRE - Local Office (Mr P J D Goode)
Comment ID	PS461
Response Date	28/02/13 11:58
Consultation Point	4 SPATIAL PRINCIPLE 4 (SP4) ? STAFFORD BOROUGH HOUSING GROWTH DISTRIBUTION ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Justified  
. Effective

**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.**

It will be seen from CPRE's foregoing comments that we dissent both from the target figures for growth within the Borough, and the selected strategy for distribution of development amongst rural communities. We cannot see that comparison with past assessments 6.41 - 6.44 contributes to the discussion when CPRE is looking towards emerging future events as the scenario that the Local Plan must confront.

6.50 claims that a sufficient supply of housing land is available to achieve the planned distribution. This statement seems to conflict diametrically with 6.19. CPRE would suggest that there is an overwhelming shortage of "previously developed land in sustainable locations" to meet the requirements, which can only be met by developing unsustainable greenfield sites, with all the consequences which we have outlined. 6.54. In summary CPRE considers that the orientation of the housing policy towards

a "growth" agenda is incorrect and unsustainable in the most fundamental way involving irreversible loss of agricultural land - greenfield sites, excessive and possibly unachievable infrastructure demands (see later submissions), and reliance on transportation models contrary to sustainability principles.

*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



## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	CPRE - Local Office (Mr P J D Goode)
Comment ID	PS462
Response Date	28/02/13 11:58
Consultation Point	5 SPATIAL PRINCIPLE 5 (SP5) ? STAFFORD BOROUGH EMPLOYMENT GROWTH DISTRIBUTION ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**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 conclusions set out in 6.57-6.59 seem to be at variance with the narrative in 6.14-6.18 and unbalanced against the labour supply projections. No firm backing study shows the floor space needs set against employee numbers except that offered by labour supply projections. This is a fundamental omission for a land-use which is both a major land-user and a generator of such large and unsustainable traffic volumes, and embraces a wholly wasteful approach to land conservation.

*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

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	CPRE - Local Office (Mr P J D Goode)
Comment ID	PS463
Response Date	28/02/13 11:58
Consultation Point	6 SPATIAL PRINCIPLE 6 (SP6) ? ACHIEVING RURAL SUSTAINABILITY ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**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.**

CPRE supports the general principles outlined here, but expresses its reservations concerning their implementation in responding to detailed policies below.

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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

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	CPRE - Local Office (Mr P J D Goode)
Comment ID	PS464
Response Date	28/02/13 11:58
Consultation Point	12 POLICY STONE 1 ? STONE TOWN ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**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.**

Whilst supporting the principles outlined, CPRE will comment later on the detailed policies. There are comments however that are relevant regarding SP7 itself.

In Na, regarding Settlement Boundaries, the wording suggests that such boundaries rather than defining the present settlement boundaries will be drawn wider to also be "adjacent to existing settlements". CPRE would be concerned at this interpretation as prejudging the appropriate extent and locations of new development areas.

*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

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	Maximus Strategic
Comment ID	PS465
Response Date	28/02/13 10:32
Consultation Point	24 Policy C1 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The final paragraph of draft Policy C1 states that: " *New developments should provide a range of dwelling types and sizes for a mixture of different households, but with the proportions based on: a. Existing household and dwelling size in the development locality; b. Indicative current waiting list data for the locality* " We object to this part of the draft policy. Paragraph 50 of the NPPF states that local planning authorities should plan for a mix of housing based on current and future trends. Developing housing to replicate the types and sizes of existing dwelling stock in the area would fail to meet future market needs. In terms of part b of this policy, it is considered that the affordable housing mix will be delivered through draft Policy C2.

**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.**

Delete the following section of draft Policy C1: "*New developments should provide a range of dwelling types and sizes for a mixture of different households, but with the proportions based on: a. Existing household and dwelling size in the development locality; b. Indicative current waiting list data for the locality*"

*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

**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**

Maximus Strategic Land is promoting one of the sites identified by the Council as a Strategic Development Locations to the north of Stafford. The site is identified in the Plan as being capable of delivering a significant proportion of the Council's housing requirement and therefore it is in Maximus interest to ensure that the Plan is formed to be legally compliant and sound. Maximus would wish to attend in order to respond to any questions relating to their land interest. We also believe that we can offer assistance to the Inspector in dealing with matters at specific oral examination sessions.



## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	Maximus Strategic
Comment ID	PS466
Response Date	28/02/13 10:32
Consultation Point	21 Policy E8 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Draft Policy E8 states that " *if planning permission is granted for retail development in an edge-of-centre or out-of centre location, the range sold at the development may be restricted either through conditions or legal agreement. No new development for retail warehouses and superstores is required in these locations at Stafford* ". Firstly, we believe that it is entirely unreasonable to introduce a policy which would place restrictions on the range of goods sold in retail developments permitted in edge-of-centre, or out-of-centre locations. Circular 11/95 makes clear that such conditions would only be considered compliant with the tests for conditions if a local planning authority would otherwise refuse the development on the grounds of impact on vitality and viability of an existing town centre. Clearly if the Council approved retail development, either in an edge-of-centre, or out-of-centre locations then they must be satisfied that the proposal would not have a significant adverse impact on the vitality and viability of the town centre, or existing committed and planned investment (public and private) in a centre. Therefore it would not be reasonable or necessary to impose conditions or require a legal agreement limiting the range of goods in these circumstances. We also believe that it is unacceptable

for draft Policy E8 to prevent the new development of retail warehouses and superstores either on the edge of, or outside of a centre. Paragraph 19 of the NPPF states that " *planning should operate to encourage and not act as an impediment to sustainable growth* ". Draft Policy E8 would clearly conflict with the NPPF by restricting a large proportion of the retail sector from locating in edge of centre or out of centre locations. Clearly if a retail warehouse or superstore is able to satisfy the retail policy tests of sequence and impact then it should be considered acceptable in policy terms. Restricting uses in the manner proposed by draft Policy E8 could impact consumer choice and potentially the Plan may fail to meet retail needs. Paragraph 23 states that " *it is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability* ". Clearly if there are no site available for retail warehouses and superstores within the town centre then edge-of-centre followed by well connected out-of-centre sites will need to be considered. The Draft Policies Map designates the Primary Shopping Area boundary however draft Policy E8 makes no reference to this. There is also no reference to secondary frontages within the policy text or on the policies map. Paragraph 23 of the NPPF states that local planning authorities should " *define the extent of the town centre and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations* ". It seems that the Council have failed to do this.

**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.**

Delete paragraph which states: *If planning permission is granted for retail development in an edge-of-centre or out-of centre location, the range sold at the development may be restricted either through conditions or legal agreement. No new development for retail warehouses and superstores is required in these locations at Stafford.*

We would suggest that primary and secondary frontages are identified on the policies map and policy amended to make clear which uses will be permitted in these locations. Additional paragraph is required to confirm that the local planning authority will apply a sequential test to planning applications for main town centre uses that are not in an existing centre; and that an impact assessment will be required for all developments for town centre uses over 2,5000 square metres.

*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

**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**

Maximus Strategic Land is promoting one of the sites identified by the Council as a Strategic Development Locations to the north of Stafford. The site is identified in the Plan as being capable of delivering a significant proportion of the Council's housing requirement and therefore it is in Maximus interest to ensure that the Plan is formed to be legally compliant and sound. Maximus would wish to attend in order to respond to any questions relating to their land interest. We also believe that we can offer assistance to the Inspector in dealing with matters at specific oral examination sessions.

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	Maximus Strategic
Comment ID	PS467
Response Date	28/02/13 10:32
Consultation Point	31 Policy N1 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

In general we find the policy sound, however we would suggest making an amendment to Part a under sub-heading 'use' so that it is consistent with recent changes to The Town and Country Planning (Development Management Procedure) (England) Order which now leaves matters of scale, layout, appearance etc for consideration in any subsequent reserved matters submission. It is also considered unnecessary for a Development Brief to be produced, as a Design and Access Statement should establish sufficient parameters to guide the future development of a site.

**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.**

Delete the following sentence: *a. Ensure that, where relevant the scale, nature and surroundings, major applications are comprehensively master planned, or, where appropriate, are accompanied by a development brief*

*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

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## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	Maximus Strategic
<b>Comment ID</b>	PS468
<b>Response Date</b>	28/02/13 10:32
<b>Consultation Point</b>	The Plan for Stafford Borough - Publication ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Policies Map The Pre-Submission Proposals Map appears to show the same, or similar, settlement boundary for Stafford as the Local Plan Adopted October 1998. Since then there have been many changes to the character of the settlement and these should be reflected in the emerging Policies Map.

As it stands therefore we strongly object to the Policies Map and in particular the settlement boundary for Stafford. The settlement boundary appears somewhat convoluted and omits large areas of the town, including existing employment land which should be included within the settlement boundary. For example main employment areas which play an important part in the overall prosperity of the town, such as Tollgate Industrial Estate and Prime Point would fall outside the settlement boundary. As a consequence this would severely limit the ability of existing occupiers to expand or redevelop sites as the provisions of draft Policy E2 would apply. This could severely hinder the economic growth of the town which would be counterintuitive for a town that wishes to be considered a growth point.

**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.**

We strongly believe that the settlement boundary for Stafford should be redrawn so that it provides a more logical edge to the settlement. It should follow physical boundaries, such as the M6 and the A513 and should encompass key employment area and areas of existing development such as Prime Point and Tollgate industrial Estate. It is also considered that settlement boundaries should extend around the boundaries of the proposed Strategic Development Locations to the North, East and West of the town.

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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**

Maximus Strategic Land is promoting one of the sites identified by the Council as a Strategic Development Locations to the north of Stafford. The site is identified in the Plan as being capable of delivering a significant proportion of the Council's housing requirement and therefore it is in Maximus interest to ensure that the Plan is formed to be legally compliant and sound. Maximus would wish to attend in order to respond to any questions relating to their land interest. We also believe that we can offer assistance to the Inspector in dealing with matters at specific oral examination sessions.

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	Maximus Strategic
Comment ID	PS469
Response Date	28/02/13 10:32
Consultation Point	2 SPATIAL PRINCIPLE 2 (SP2) ? STAFFORD BOROUGH HOUSING & EMPLOYMENT REQUIREMENTS ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3

**Justified:** the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

**Do you consider that the Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

We broadly support the proposed housing requirement for Stafford Borough set out under draft Policy SP2. However, in order for it to be effective, particularly with regard to draft Policy SP4, the housing and employment apportionment between Stafford town, Stone, Key Service villages and Other Borough Areas needs to be clearly framed in policy. Therefore it would make sense to incorporate the housing and employment Tables currently set out at 6.54 and 6.59 within the framework of policy SP2. This would ensure that the Plan accords with paragraph 156 of the NPPF, which states that the Local Plan should include policies to deliver " *the homes and jobs needed in the area* ". This is particularly important in circumstances where the spatial distribution of housing and employment land is a key component of the overall strategy for the planning area. We also consider that the total requirement for the Borough, currently 10,000 dwellings between 2011-2031, should be a minimum figure. As more up to date information on demographic trends emerges over the course of the Plan, the policy should be reviewed and updated accordingly. This would ensure that the housing strategy is consistent with the NPPF (paragraphs 14, 17, 50, 157 and 159) and would also mean that the Plan is more effective in terms of meeting the " *objectively assessed needs for the market and affordable housing in the housing market area* " (NPPF para. 47) over the plan period. Draft Policy SP2 should also acknowledge that a further 400 new dwellings will be provided for MoD personnel in order for the Plan to be consistent with paragraph 164 of the NPPF. With regards to the proposed employment requirement, whilst we have

no objection to the amount of land provided, we strongly believe that in order for the Plan to deliver the 'Spatial Vision' which identifies Stafford town as a growth point, it will be vital for sufficient new employment land to be identified in order to support housing growth. As it stands the Plan fails to do this which is concerning. The provision of new jobs in accessible locations is key to the achievement of sustainable development. There is a risk that the overall prosperity of Stafford town could be harmed by allowing significant allocation of employment land outside of the town. In which the Council's strategy on employment provision could undermine other aspirations of the Plan and in particular the effectiveness of draft policies SP3, SP4, SP7 and the Spatial Vision.

**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.**

We suggest that draft Policy should include a clear breakdown of the Council housing and employment land provision. In which case the Table set out at paragraph 6.54 and 6.59 should be framed within draft Policy SP2. The Policy should also be amended so that the housing requirement for the Borough is a minimum figure and that the 400 new dwellings to be provided for MoD personnel should also be acknowledged. Finally, the policy text should include provisions which would allow the housing supply to be regularly monitored and reviewed, and where more up to date evidence on projected demographic trends becomes available would allow the housing requirement to be updated.

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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

**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**

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## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	Maximus Strategic
Comment ID	PS470
Response Date	28/02/13 10:32
Consultation Point	8 POLICY STAFFORD 1 ? STAFFORD TOWN ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Under the heading 'housing' draft Policy Stafford 1 states that to meet the " *housing requirement for Stafford Town by providing 5,500 new homes, including additional provision for Ministry of Defence personnel* ". As it stands this wording is unjustified as any housing required by the MoD should be separate and in addition to this figure. The 2008 Household Projections form the basis of the Council's housing requirement. The 2008 Projections modelled resident and foreign armed forces separately[1] from the general population. We therefore believe that a separate allowance should be made for troops returning to Beaconside Barracks from Germany. A similar approach was also clearly endorsed by the Panel when considering the West Midlands Regional Spatial Strategy Phase Two Revision in 2009. The Panel Report stated that " **housing provided for returning defence personnel would not become part of the generally available stock** " and that " **the Council needs to recognise the likelihood that there will be around 1,000 additional dwellings at Stafford** ". It would therefore

seem entirely appropriate for the 400 dwellings per year to be ring-fenced for open market housing with any additional housing required by the MoD treated separately. Notably draft Policy draft SP 2 acknowledges that the MoD requirement is in addition to the 400 per annum proposed. As does part v. under the housing sub-heading. There is clearly a discrepancy and therefore draft Policy Stafford 1 should be amended to reflect draft SP 2. With regard to the requirement for Stafford town we are concerned that the Council may fail to achieve their headline target of 7,200 new dwellings. The Council's supply includes a number of commitments which may not be completed, particularly larger apartment's schemes or where planning permission has been granted subject to onerous S.106 requirements. The Council also have a poor track record of achieving the spatial distribution of housing with significant numbers leaking to less sustainable rural areas. The Council's Strategic Housing Assessment (2012) for example demonstrates that 57.4% of the houses built between 2010 to 2012 were outside of Stafford town. Furthermore only 58% of the Council's commitments (listed under paragraph 6.54 of the draft Plan) are located in Stafford town. This means that the housing supply and past completions are out of kilter with draft Policy SP4. As soon as the Local Plan is adopted, the Council will be failing to meet this key policy objective. We support the Council's approach outlined in Policy Stone 2, of delaying the delivery of the Strategic Development Location in Stone until 2021 in order to allow Stafford to catch up. There remains a potential issue of housing leaking towards other rural areas which is more difficult to manage. In order to deliver the spatial distribution and prevent housing leaking from Stafford mechanisms need to put in place to monitor and manage the distribution of housing over the Plan. This should be sent in policy. It is noted that paragraph 6.49 of the Pre-Submission Local Plan acknowledges that if a level of development more than 25% greater than the spatial principle SP4 proportion by a particular hierarchy (i.e. Stone or Key Service Villages) over a 4 year period then this could trigger restrictions through a moratorium. Whilst we support this approach, in order for it to be effective it needs to be framed in policy. In relation to loss of employment land, we believe that the wording is onerous and inconsistent with paragraph 22 of the NPPF which states " *planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose* ". The NPPF also defines 'economic development' as those uses within B Use Classes, public community uses and main town centre uses, in recognition of the job opportunities that these uses can provide. Draft Policy Stafford 1 clearly fails to recognise the importance that these other uses have in creating new job opportunities and helping achieve sustainable economic growth. The draft policy should be amended to reflect the NPPF.

[1] Office for National Statistics - 2008-based Subnational Population Projections for England : methodology guide

**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.**

Amend Draft Policy SP 2 to ensure mechanisms are in place to maintain the spatial apportionment of housing across the Borough and ensure that 72% of the total housing requirement is delivered in Stafford town. Amend the first sentence under sub-heading 'Housing' so that the figure includes the 400 additional homes for the MoD personnel in the total requirement for Stafford town. Overall the headline figure for Stafford should state: ***Continue to meet the housing requirements of Stafford town by providing 7,660 new houses required for Stafford, including provision of 400 new homes for MoD personnel.*** Under employment sub-heading we would also suggest the following wording: **Development or conversions must not result in the loss of good quality employment land to non-employment generating uses unless either: 1. There is overriding evidence to demonstrate that the current use is presently causing or consistently caused significant nuisance or environmental problems that could have been mitigated; or 2. The loss of jobs would not result in a significant reduction in the range and diversity of jobs available within Stafford Borough; and 3. There is evidence, provided by the applicant, to show the premises or site has been marketed for as period of 6 months or more without success for; or 4. The benefits in terms of the development outweighs the retention for employment-generating uses.** We also strongly believe that the settlement boundary for Stafford town, as shown on the Pre-Submission Policies Map needs to be redrawn to include the Strategic Development Locations (North, East and

West) and follow logical physical boundaries, which for example would mean that areas such as the Tollgate Industrial Estate are not situated outside of the settlement boundaries.

*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

**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**

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## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	Maximus Strategic
Comment ID	PS471
Response Date	28/02/13 10:32
Consultation Point	9 POLICY STAFFORD 2 ? NORTH OF STAFFORD ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Policy Stafford 2 - North Stafford; Development North of Stafford Town Plan (pg 49); Stafford North Concept Diagram (50) and the Pre-Submission Policies Map We are in strong support to north Stafford as a Strategic Development Location. Maximus Strategic Land has promoted land north of Beaconside since 2008 and evidence has been submitted during preparation of the Local Plan (formerly Core Strategy) to demonstrate that the site is capable of delivering a far greater level of housing than currently proposed by the Pre-Submission Plan. An illustrative masterplan for the site was prepared taking in to account known constraints, and was designed to accommodate the scale of growth originally proposed for the Site (SF2) in the Council's Issues and Options Paper. This document identified the site for nearly 3,000 dwellings and 9.8 ha of employment land. A copy of this illustrative framework plan (drawing number: BIR.2908\_02-1C is submitted with these representations. The site was also identified as the least constrained in the Council's Infrastructure Strategy: Stage 1 Final Report (2009),

which assumed broadly the same level of growth proposed by the Issues and Options document i.e 3,000 and 4 ha employment land. The following evidence has been produced to demonstrate the deliverability of the site: New Buildings Form Flood Mapping Study Option H Technical Note New Buildings Form Flood Mapping Study - Hydraulics Modelling Summary Report Preliminary Drainage Appraisal Rev A Ecological Appraisal Protected Species Survey Summary Transport Strategy Review of Traffic Implications Sewer Capacity Study - Hydraulic Modelling Summary Report Landscape and Visual Appraisal Archaeological Desk-Based Assessment These documents are submitted with these representations to assist the Inspector when considering matters of deliverability. Recently the government has gone out to consultation on their initial preferred route for HS2 running between Birmingham and Manchester. Maximus became aware that the route would potentially cross the northern fringe of the site, impacting upon the proposed developable area. The illustrative masterplan has therefore been updated to move development away from the HS2 route and also reduce the overall number of dwellings to 2,000 so that it would be consistent with the level of housing now proposed by the Council. Drawing number BIR.2908\_02-2 is the latest Masterplan for the site and is submitted with these representations for consideration. Maximus do however disagree with the Council regarding the extent of the land area to be allocated. The Council are showing a smaller land area than that which has been put forward by Maximus. As a consequence Maximus object to the land area shown on page 49 and the Stafford North Concept Diagram on page 50. It is considered that the area of land shown by the Council would not be capable of accommodating the level of housing proposed the Site i.e. 2,000 dwellings. We have tested the site area whether the site area identified by the Council could accommodate 2,000 new homes on the assumption of 30 dph. When taking in to account on site constraints, the integration of green infrastructure and other essential facilities which need to be designed in to the scheme, we believe that the area shown by the Council would be insufficient to meet the level of growth proposed for north Stafford. Persisting with the Council's proposed allocation (site area) could introduce issues of deliverability which is something we would wish to avoid. The latest illustrative framework plan produced by Maximus provides a far better and considered design solution for the site, taking in to account constraints of the site. It represents a far more deliverable proposal by virtue of the fact that the design incorporates road, drainage and green infrastructure, including on-site SANGs, as well as primary school and local centres to support new housing. In terms of the policy text of draft Policy Stafford 2, we would make the following comments: In the opening paragraph draft Policy states " *any application for development on a part or the whole of this area must be preceded by, and consistent with, a Master Plan for the whole Strategic Development Location which has been submitted and agreed by the Council* ". We have consistently questioned why it is necessary to submit a masterplan for approval of the local planning authority outside of a formal planning application process. In terms of the various 'key requirements' set out under draft Policy Stafford 2, it is considered that the majority of these items could reasonably be incorporated in any development proposals. We do however question the need for a library and the need to provide secondary school provision on site. Appendix D of the Pre-Submission Plan states that a contribution would be required for an extension to one or more existing secondary school(s) would be required. This is consistent with the advice Maximus has received by Staffordshire County Council as education authority. In terms of infrastructure requirements, a number of these items would be covered under draft Policy 11 which is intended to deliver key infrastructure. In terms of those items identified for land north of Stafford, we would object to a new perimeter road. Maximus commissioned David Tucker Associates to assess potential traffic impacts of development of the site and this does not justify the delivery of a new perimeter road (or by-pass). The Council's Infrastructure Strategy: Stage 2 Final Report (2012) also fails to support the delivery of a new by-pass and instead it suggests highway capacity improvements along the A513 would be necessary. We agree with this conclusion. Finally, Maximus along with Akzo Nobel who are promoting neighbouring land, recently carried out a public consultation exercise including two exhibitions to seek the views on proposals for growth north of Stafford. The responses from this exercise are still being collated but the results will be shared with the Council in due course. A copy of the consultation leaflet which includes details of the exhibitions is submitted with these representations.

**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.**

Maximus Strategic Land is promoting one of the sites identified by the Council as a Strategic Development Locations to the north of Stafford. The site is identified in the Plan as being capable of delivering a significant proportion of the Council's housing requirement and therefore it is in Maximus interest to ensure that the Plan is formed to be legally compliant and sound. Maximus would wish to attend in order to respond to any questions relating to their land interest. We also believe that we can offer assistance to the Inspector in dealing with matters at specific oral examination sessions.

*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

**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**

Maximus Strategic Land is promoting one of the sites identified by the Council as a Strategic Development Locations to the north of Stafford. The site is identified in the Plan as being capable of delivering a significant proportion of the Council's housing requirement and therefore it is in Maximus interest to ensure that the Plan is formed to be legally compliant and sound. Maximus would wish to attend in order to respond to any questions relating to their land interest. We also believe that we can offer assistance to the Inspector in dealing with matters at specific oral examination sessions.

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	Maximus Strategic
Comment ID	PS472
Response Date	28/02/13 10:32
Consultation Point	22 Policy T1 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Justified
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Part b. of draft Policy T1 requires new developments to "produce Transport Assessments and Travel Plans including consideration of public transport, as well as facilitating the provision of safe and well integrated parking". We believe that the requirement for all new development to produce a Transport Assessment and Travel Plan is not justified and would conflict with paragraph 193 of the NPPF which states that information requirements for applications should be proportionate to the nature and scale of development proposals. It is also notable that Part d of the draft Policy requires transport impacts to be assessed in accordance with DfT guidance, which sets thresholds for Transport Assessments and Transport Statement. In which case there is no need for Part b as transport impacts are covered elsewhere in draft Policy T1. As a consequence Part b should be deleted.

**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.**

Delete Part b of draft Policy T1

*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

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**If you wish to participate at the Examination in Public, please outline why you consider this to be necessary**

Maximus Strategic Land is promoting one of the sites identified by the Council as a Strategic Development Locations to the north of Stafford. The site is identified in the Plan as being capable of delivering a significant proportion of the Council's housing requirement and therefore it is in Maximus interest to ensure that the Plan is formed to be legally compliant and sound. Maximus would wish to attend in order to respond to any questions relating to their land interest. We also believe that we can offer assistance to the Inspector in dealing with matters at specific oral examination sessions.



## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	Maximus Strategic
Comment ID	PS473
Response Date	28/02/13 10:32
Consultation Point	5 SPATIAL PRINCIPLE 5 (SP5) ? STAFFORD BOROUGH EMPLOYMENT GROWTH DISTRIBUTION ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Draft Policy SP5 states that "*in order to achieve the scale of new employment identified in Spatial Strategy SP2, annual targets for the distribution of employment land development, supported by necessary infrastructure, will be:*

- . *Stafford 56%*
- . *Stone 12%*
- . *Rest of Borough Area 32%*"

This draft Policy is entirely at odds with Policy SP1 and the identification of Stafford town at the top of the sustainable settlement hierarchy. The identification of Stafford town as a growth point should also mean that it should be the focus for housing and job growth. To achieve sustainable development employment opportunities should be accessible by a variety of modes of transport. In order to reduce

journey lengths, employment should be located close to housing. To locate 32% of employment land would severely undermine the Council's strategy of achieving high levels of growth in Stafford town, which is clearly the most sustainable location and why it sits at the top of the settlement hierarchy.

If Stafford town is to be the focus for the greatest proportion of new housing then employment land will need to be designated to provide the jobs required to support growth. Paragraph 29 of the NPPF states that *the transport system needs to be balanced in favour of sustainable transport modes, giving people real choice about how they travel*". By locating employment in rural areas which are less well served by public transport would conflict with this section of the NPPF. The NPPF also states at paragraph 19 that " *The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth*". We are concerned that locating a large amount of employment growth in less sustainable rural areas clearly conflicts with the government's main objections. Overall we are very concerned about the relative proportion of employment land being provided compared with housing. Too much land is being reserved in the Rest of the Borough which will encourage people to travel further, or live in rural areas rather than the County town. The approach proposed by draft Policy SP5 is unjustified and would harm the effectiveness of draft Policy SP4.

**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.**

We urge the Council to reconsider the apportionment of employment land. Stafford town should be the focus for equivalent levels of employment and housing growth. The percentage of new land identified for employment land should be higher so that is comparable with the quantum of growth apportioned for new housing. It is also considered necessary for the table set out below paragraph 6.59 should form part of draft Policy SP5 as the NPPF (paragraph 156) clearly states that local planning authorities should set out strategic priorities for the area, including policies to deliver jobs needed in the area.

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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

**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**

Maximus Strategic Land is promoting one of the sites identified by the Council as a Strategic Development Locations to the north of Stafford. The site is identified in the Plan as being capable of delivering a significant proportion of the Council's housing requirement and therefore it is in Maximus interest to ensure that the Plan is formed to be legally compliant and sound. Maximus would wish to attend in order to respond to any questions relating to their land interest. We also believe that we can offer assistance to the Inspector in dealing with matters at specific oral examination sessions.

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	Bellway Homes (Mr Fergus Thomas)
Comment ID	PS474
Response Date	01/03/13 11:25
Consultation Point	3 Policy Influences (National and Local) ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Duty to Co-operate However, before considering matters of 'soundness' the Borough Council must first demonstrate that it has met the 'Duty to Co-operate' set out within Section 110 of the Localism Act 2011. Unless this legal requirement can be shown to have been met, the Plan cannot proceed to adoption. The '*Plan of Stafford Borough - Publication Consultation Statement' January 2013*, explains (within Chapter 3) the range of authorities and organisations with which the Borough Council has consulted and the vehicles through which this consultation has taken place (eg. the SHMA 2008 - Northern and the SHLAA Panel). Chapter 3 of the Plan also addresses the Duty to Co-operate. However neither of them indicate the key outcomes and therefore the arrangements and agreements which have been made with neighbouring authorities to meet housing needs. This could, we feel, be a weakness in the Plan and should be more clearly expressed in the Submission version of the Plan. It

is worth bearing in mind that any shortcomings in this respect cannot be effectively redressed once the Plan reaches the Examination stage and should therefore be addressed beforehand.

*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

**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**

Because this is a crucial issue for the Plan.

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	Bellway Homes (Mr Fergus Thomas)
<b>Comment ID</b>	PS475
<b>Response Date</b>	28/02/13 11:25
<b>Consultation Point</b>	The Plan for Stafford Borough - Publication ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	0.3

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Preparation of the Plan It is clear from the age and range of documents within paragraph 1.6 that the Plan for Stafford has been prepared over a long period of time as a result no doubt - in part - of frequent changes in national policy direction. It will be important however that the evidence base is fresh and fully up to date. These are aspects which will be scrutinised closely and tested at the Examination in Public to ensure that the Plan is both positively prepared, justified, effective and legally compliant.

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	Bellway Homes (Mr Fergus Thomas)
<b>Comment ID</b>	PS476
<b>Response Date</b>	28/02/13 11:25
<b>Consultation Point</b>	2 Spatial Portrait for Stafford Borough (Where are we now?) ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	0.3

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

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The Plan spells out the characteristics of the Borough and the newly released population figures from the 2011 Census. It also highlights the fact (in paragraph 2.4) that Gnosall with a population of 3,783 is the largest of the rural settlements, a point repeated in paragraph 2.26.

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	Bellway Homes (Mr Fergus Thomas)
Comment ID	PS477
Response Date	28/02/13 11:25
Consultation Point	4 Key Issues ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Key Issues Chapter 4 of the Plan spells out the key issues facing the Borough, which Bellway Homes broadly supports. More specifically, *inter alia*, the Plan is committed to:-

- . *? Delivering and Managing the Borough's Growth* - against a background where Stafford Borough has been identified as a 'Growth Point' to facilitate long-term sustainable growth and realise full economic potential. The Plan indicates that 'the addition of more residential development will enable Stafford to achieve its full potential as a key sub-regional centre'.
- . *Providing affordable homes* - the Plan underlines the fact that demand for housing arises from a combination of natural demographic change, increased growth in single person households and inward migration. This is especially true in rural communities, but the delivery of affordable housing is critically dependent upon provision of market housing - which is essential in itself, our site at Gnosall can provide a contribution in this respect. This heading should be revised to relate to 'market' as well as affordable housing.

- . *Bringing regeneration benefits to the Borough'* - including the success of its town and other settlements. The Plan stresses that it is important that the Borough's town centres and village centres continue to thrive as the primary focus for shopping, services and facilities to meet the commercial and community needs to sustain the viability and vitality of these centres and their rural hinterlands. Gnosall is clearly an example of such a settlement.

*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



## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	Bellway Homes (Mr Fergus Thomas)
Comment ID	PS478
Response Date	28/02/13 11:25
Consultation Point	5 Spatial Vision and Key Objectives ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The Spatial Vision within Chapter 5 is critical in setting out the long-term objectives for the Borough. However, we have two key concerns:- Firstly, point c. refers to providing 'a range of housing types and tenures to meet the **local** needs of all communities ...'. In our view this falls well short of the positive objectives which should apply to a Growth Point. Furthermore, it does not indicate any appetite to 'boost significantly the supply of housing' which is the intention of Paragraph 47 of National Planning Policy Framework ('the Framework'). In our view the word 'local' should be replaced by '**full objectively assessed needs for market and affordable housing**' to be consistent with the 'Framework'. This is important for the Plan to be regarded as '*Positively prepared*'. Secondly, point q. which relates to the villages, again refers to delivering a range of new housing at villages to provide for '**local**' needs. The word 'local' should be replaced by '*the assessed needs of the Borough*' as the villages cannot be viewed in isolation. We support the Key objectives for the villages, especially

**Objective 25** which commits the Plan to ? *providing new high quality homes, including new affordable homes on appropriate sites in existing villages, to support sustainable rural communities in the future.*

*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

**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**

to be involved in the process

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	Bellway Homes (Mr Fergus Thomas)
Comment ID	PS479
Response Date	28/02/13 11:25
Consultation Point	24 Policy C1 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The dwelling mix proposed on a site will depend entirely on individual site circumstances and the needs of the area. The mix will also be determined by the market demand within the locality and the viability of the site. Design quality will be an additional but probably not a determining element. The tendency for the proportion of married couples to decrease and for an increase in single person households does not necessarily point to the need for smaller dwellings. Many of these households may still have families or may be occupied by divorcees who require extra bedrooms for children. Furthermore, single elderly persons may prefer to stay in their homes and hence may not release larger homes to the market. These factors are entirely outside the control of the Council. Point 2 within the policy therefore needs to be amended by replacing the words; ? *However the final mix will be determined in line with Government policy and linked to design issues*' to read, ?*However the final mix will be achieved through negotiation with the developer and influenced by market demand, local needs, viability issues and*

*housing design requirements, informed by Government policy'. This will cover those matters relating to dwelling size and local waiting lists so therefore points a. and b. can safely be deleted.*

**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.**

*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

**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**

To resolve any lack of clarity

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	Bellway Homes (Mr Fergus Thomas)
Comment ID	PS480
Response Date	28/02/13 11:25
Consultation Point	25 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Whilst we recognise that the Council may wish to maximise the delivery of affordable housing from allocated sites, there is no evidence within the Local Plan (or supporting documents we have seen) which shows that the rural sites are more capable of supporting 40% affordable housing (rather than the 30% target requested in Stafford town). The Local Plan does not provide up to date supporting viability evidence which justifies the 40% figure. We sense therefore that the long gestation period of the Plan has not reflected both the change in Government attitudes towards 'cutting red tape' and reducing development costs but also the abrupt change in the financial climate which has occurred since the credit crunch. We consider that a 30% target for affordable housing is more realistic, albeit the Council must adopt a flexible approach as set out at paragraph 50 of the 'Framework', as in some cases a lower contribution may be justified on viability grounds given the ever changing market conditions. This therefore fails the 'justified' test and is not consistent with national planning policy. In

the case of some settlements, including Gnosall, Affordable Housing Needs surveys may have been carried out which help to pinpoint specific requirements at a particular point in time. Indeed, there may have been schemes delivered in the meantime which have catered for an element of those identified needs. Bellway Homes is anxious to work with the Borough Council and the Parish Council to ensure that the design and nature of any housing scheme takes account of the needs and demands arising within the local community.

*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

**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**

Because affordable housing is a key issue

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	Bellway Homes (Mr Fergus Thomas)
Comment ID	PS481
Response Date	28/02/13 11:25
Consultation Point	15 Policy E2 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

It is assumed that this policy is designed to serve as a housing and employment policy within those rural communities outside the Key Services Villages which will have defined settlement limits. If not, and this policy does relate to KSV's, then criterion iv. Is far too restrictive in limiting development to "essential local development needs of a community".

*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

**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**

To resolve any lack of clarity



## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	Bellway Homes (Mr Fergus Thomas)
<b>Comment ID</b>	PS482
<b>Response Date</b>	28/02/13 11:25
<b>Consultation Point</b>	40 Policy I1 ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

This would appear to provide a 'blank cheque' to the local authority without actually demonstrating the viability of infrastructure or the housing or employment allocations. As set out at paragraph 173 of the Framework, sustainable development requires careful attention to viability and costs in plan-making and decision taking. As such, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. Under the provisions of the Framework supported by new guidance within the Harman Report, local authorities are expected to demonstrate the overall viability of the Plan and show that infrastructure can be delivered and at what cost. The Community Infrastructure Levy then provides the vehicle to assist in the delivery of this strategic infrastructure, in place of pooled or community S106 payments. This work appears to be at a fairly early stage.

*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

**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**

To resolve any lack of clarity

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	Bellway Homes (Mr Fergus Thomas)
Comment ID	PS483
Response Date	28/02/13 11:25
Consultation Point	31 Policy N1 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The Company prides itself on building to high standards and always conforms with Part M of the Building Regulations. We would have some concerns if the policy were interpreted as requiring Lifetime Homes standards for each dwelling which would both increase costs, reduced affordability and introduce features which were not needed by the vast majority of occupants.

*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

**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**

To resolve any lack of clarity

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	Bellway Homes (Mr Fergus Thomas)
<b>Comment ID</b>	PS484
<b>Response Date</b>	28/02/13 11:25
<b>Consultation Point</b>	32 Policy N2 ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

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Whilst Bellway Homes Ltd makes every effort to conform to standards which help further sustainability and help combat climate change, it is not always possible to incorporate Sustainable Urban Drainage techniques (SUD's) into higher density sites and especially village sites without comprising on other design aspects. Furthermore, the introduction of grey water recycling initiatives can cause higher costs and practical issues in terms of installation, maintenance and use. This policy therefore needs to be framed and/or applied more flexibly.

*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

**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**

To resolve any lack of clarity

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	Bellway Homes (Mr Fergus Thomas)
Comment ID	PS485
Response Date	28/02/13 11:25
Consultation Point	2 SPATIAL PRINCIPLE 2 (SP2) ? STAFFORD BOROUGH HOUSING & EMPLOYMENT REQUIREMENTS ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

We note that the Council has opted for a 'rounded' figure of 500 dwellings per year, which it is argued in paragraph 6.11 conforms with the 2008 CLG Housing Projections. (The 2010 Household Projections have not yet been issued). This 500 per year figure is repeated, but not explored, within the 2012 Strategic Housing Market Assessment, conducted by ARC4 Ltd. However, we are not convinced that this figure is either sufficiently robust or has been adequately justified, nor does it fairly represent an example of a Plan which is 'positively prepared'. Our concerns are as follows:-

- . Firstly, a basic increase of 500 new households per year **does not** equate to a need for 500 additional dwellings per year. To this figure must be added allowance for vacant dwellings (usually

around 3%), second homes and shared dwellings. This might add a further 5 % to convert households to dwellings,

- . Secondly, the 500 dwelling figure ignores the existing level of outstanding housing need, measured by Table 4.8 of the ARC4 report as being 1013 households (at 2012) - over 200 of which are in smaller communities outside Stafford and Stone, as well as concealed households (those families with children living with other households) and also families which are declared homeless. Table 4.16 of the ARC4 report indicates that 98 families in the Borough were accepted as homeless each year, and
- . Thirdly, the 500 figure makes no allowance for replacement dwellings to compensate for those homes which are demolished over the Plan period. There were around 56,000 dwellings in the Borough at 2010. Some of these will ultimately need to be replaced during the Plan period and hence, unless the Plan provides additional land for housing, **all** those 56,000 dwellings will need to last indefinitely. The alternative is to express the housing requirement as a **net** figure.
- . We would argue that in order to 'boost housing supply' the Plan should provide for a net annual increase of at least 550 dwellings per year (equivalent to the last West Midlands RSS figure) which takes into account the concerns listed above. Without this we consider that the Plan cannot reasonably be regarded as 'positively prepared'.
- . This 550 figure is still below two of the three scenario figures recommended by Nathaniel Lichfield & Partners (in their 2008 report to DCLG West Midlands Office prepared as an input to the West Midlands RSS). It is not appropriate to gauge the future dwelling requirement on the level of recent completions, which as the graph on page 24 shows, includes a period of deep recession and during a time when there was no positively prepared Local Plan in place.
- . This 550 dwelling per annum figure also ignores any shortfalls from other neighbouring authorities. We note, for example, that the Cannock Chase Local Plan, which has reached an advanced stage, provides for much less than the WMRSS figure and similarly Telford & Wrekin Local Plan, which was adopted in 2006, provides for less than the WMRSS proposed. The South Staffordshire Local Plan was equivalent to the WMRSS figure, but somewhat below the CLG household projections. Clearly unless all local authorities provide an adequate level of housing provision, the 'housing jigsaw' will never fit together.
- . It follows that we do not support the figures in the table within Paragraph 6.54 which will need to be adjusted upwards. Further work will also need to be undertaken to establish whether the discount rate of 10% across the board, is similar within the rural areas as in Stafford and Stone.

*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

**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**

Because housing provision is a key issue for the Plan



## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	Bellway Homes (Mr Fergus Thomas)
<b>Comment ID</b>	PS486
<b>Response Date</b>	28/02/13 11:25
<b>Consultation Point</b>	4 SPATIAL PRINCIPLE 4 (SP4) ? STAFFORD BOROUGH HOUSING GROWTH DISTRIBUTION ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The level of housing identified within Stafford, Stone, the Key Service Villages and the remainder of the Rural Area has been assessed as 72%, 8%, 12% and 8% respectively. These are remarkably precise and are made even more prescriptive by being expressed as 'annual targets' within Policy SP4. Bellway Homes would be comfortable with indicative figures but would be opposed to arbitrary annual targets, especially when the delivery of sites can depend upon such a wide variety of technical, marketing and infrastructure factors which lie outside the control of both the developer and the local authority. There is simply no need for rigid targets which will serve to impede rather than promote much needed development. Furthermore, we note that both the level of population and the delivery of housing in the past have tended to be more weighted towards the rural areas, which (coupled with

the higher level of current commitments) would tend to imply that the 12% allocation in the rural areas is inadequate. We would suggest that the word 'annual' is replaced by the word 'indicative' and that the 12% figure for the Key Service Villages is reviewed, with the aim of focusing a greater number in the main service villages, such as Gnosall. Otherwise the Plan will neither be 'positively prepared', effective or consistent with national policy - which is designed to boost housing supply and support communities. We would be opposed to the sort of sanctions, such as introducing moratoria on development, which is suggested in paragraph 6.49. This conflicts with the spirit of Spatial Principle 1 and the notion of 'boosting housing supply'.

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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**

Because housing provision is a key issue for the Plan

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	Bellway Homes (Mr Fergus Thomas)
<b>Comment ID</b>	PS487
<b>Response Date</b>	28/02/13 11:25
<b>Consultation Point</b>	7 SPATIAL PRINCIPLE 7 (SP7) ? SUPPORTING THE LOCATION OF NEW DEVELOPMENT ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

We note that settlement boundaries for Key Service Villages are to be set either through the Neighbourhood Planning process or through a Site Specific Allocations Document. We accept that the guidance criteria for the drawing of settlement boundaries around villages is broadly logical but we are concerned about the final paragraph within the policy which is effectively a 'brownfield first' policy. This should be tempered by deleting the second sentence. We understand the sentiments about increasing 'localism', we are concerned that an over-reliance on Neighbourhood Plans could have a number of drawbacks:-

- . Firstly, the speed of Local Plan preparation will progress at the speed of the slowest - unless very strict timescales are adhered to. There needs to be a clear contingency plan in place.
  - . Secondly, we would be concerned that few Neighbourhood communities will take the Local Plan process sufficiently seriously and may be inclined to resist rather than promote development. In addition, there is also a danger that local interests may favour their own land for allocation, and
  - . Thirdly, a reliance on Neighbourhood Plans could leave the Council vulnerable to delay if subsequent referenda decide that the NP should be rejected. This could be dispiriting for local communities. We certainly don't accept the notion that land in sustainable locations should be held back until Neighbourhood Plans are adopted if there is already a demonstrable need. After all, the Government is anxious to significantly boost housing supply now.
- We would suggest that the Council needs to be in firm control of the Site Specific Allocations Plan process, which needs to run in parallel with the Neighbourhood Plan programme, if only to provide a useful 'backstop' should Neighbourhood Plans not materialise.

*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

**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**

Because housing delivery is a key issue for the Plan

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	Bellway Homes (Mr Fergus Thomas)
<b>Comment ID</b>	PS488
<b>Response Date</b>	28/02/13 11:25
<b>Consultation Point</b>	6 SPATIAL PRINCIPLE 6 (SP6) ? ACHIEVING RURAL SUSTAINABILITY ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	0.3

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

**Spatial Principle 6 - Achieving Rural Sustainability** Bellway Homes Ltd supports the policy of achieving sustainable communities from both the social and economic viewpoint and they accept the need to create a sustainable rural economy and conserve and improve the rural environment. Gnosall, as the largest of the Borough's rural settlements, has a good range of local services and therefore a high degree of self-containment coupled with good links public transport to the larger towns, especially to Stafford (to the east) and the Newport and Telford (to the west).

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	Akzo Nobel UK Ltd c/o Jones Lang LaSalle (Mr Frazer Sandwith)
Comment ID	PS489
Response Date	28/02/13 10:12
Consultation Point	6.50 Paragraph ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Paragraph 6.50 to 6.54 - Potential Number of New Homes **Total Housing Requirement For Stafford Borough and Stafford Town**

We have identified in our representation to Policy SP2 that The Plan For Stafford Borough does not provide sufficient housing to meet housing needs within the Borough. Clearly, the implication of failing to provide for sufficient housing means that The Plan For Stafford Borough fails to make sufficient provision for housing development sites across the Borough, having regard to the housing growth distribution proposed in Policy SP4.

In this regard, if the overall quantum of housing development is deemed to be insufficient and not sound, it follows that the total requirement of new homes which is identified for the County Town of Stafford is also insufficient and therefore unsound.

### **Approach to Establishing New Provision**

Notwithstanding the above, in order to establish how much development is required by The Plan For Stafford Borough proposals, Stafford Borough Council has discounted and subtracted current commitments from the total requirement for Stafford Borough over the Plan period to 2031. Paragraph 6.54 of the Plan suggests that in the past, Stafford Borough has experienced approximately 90% of commitments being delivered as completions and a 10% discounting assumption has been applied to reflect the likelihood that some of the sites may not come forward during the five year period.

Akzo Nobel UK Ltd can find no clear evidence to underpin these delivery rates. Furthermore Paragraph 6.53 of the Plan states that the discounting assumption will be '...subject to annual monitoring of completions and new commitments' yet the 10% discounting assumption is not expressed/applied as a flexible number and no alternative lower discounting assumptions appear to have been properly taken into consideration or addressed - to show that the plan can deal with changing circumstances - following previous representations or in the Sustainability Appraisal.

Sentence 2 of Footnote 11 to paragraph 47 of the NPPF states that 'Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.'

The Former Castle Works site appeal decision shows that there has been a persistent under delivery of housing in Stafford1. Indeed where there has been a persistent under delivery paragraph 47 of the NPPS requires local authorities to provide a 20% buffer in the five year housing land supply to ensure choice and competition in the market of land. In this context Akzo Nobel UK Ltd considers that over reliance on unimplemented permissions would be unsound and contrary to the positive approach set in paragraph 17 of the National Planning Policy Framework. Fundamentally, Akzo Nobel UK Ltd considers that the stated and committed land supply should be credible and robust. It is therefore not appropriate to simply assume that 90% of sites with planning permissions for residential development will be delivered and each site with planning permission should be critically and objectively reviewed.

Furthermore, in light of the changing economic climate, previous permitted developments such as apartment schemes may no longer be deliverable in exactly the same form.

Akzo Nobel UK Ltd are already aware of 3 sites with no planning permission status or realistic prospect of being delivered within 5 years that are included in the committed land supply:

- . Former Clinical Waste Boiler House
- . Derelict Land - Forecast Street
- . Former Library Headquarters
- . 08/10770/OUT - 42 Apartments - deadline for reserved matters expired on 27 November 2012
- . 09//12519/FUL - 44 Sheltered apartments for the Elderley plus managers apartment - Sheltered housing is a C2 'Residential Institution' Use and not C3 Dwelling houses and should not form part of the committed supply.
- . 07/07607/OUT - Residential Development 40-45 dwellings. - Deadline for reserved matters expired on 7 January 2013. Extension of time application submitted 12/18013/EXTO and is still being considered. Supporting letter states that applicant has been unable to secure a developer to acquire and deliver the site.

If necessary, Akzo Nobel UK Ltd will undertake further more detailed analysis of the committed supply prior to the Examination.

Within this context Akzo Nobel UK Ltd consider that The Plan For Stafford Borough should not unnecessarily (by overly relying on undelivered commitments) prevent or limit the extent of Strategic Development Locations which are capable of being brought forward in a sustainable way to facilitate housing delivery during the early part of the Plan period and/or provide the best way of achieving the supply of new homes.

This approach would accord with Paragraph 52 of the NPPF which states that: '*The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new*

*settlements or extensions to existing villages and towns that follow the principles of Garden Cities. Working with the support of their communities, local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development....'*

(most relevant points only , our underlining).

**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.**

Akzo Nobel UK Ltd have identified in our representation to Policy SP2 that The Plan For Stafford Borough does not provide sufficient housing to meet housing needs within the Borough.

Akzo Nobel UK Ltd does not consider that it is appropriate to assume that 90% of planning permissions will be implemented and delivered. Alternative, lower scenarios should be considered.

Redrafting of the identified paragraphs will be necessary to support different higher 'New provision' housing levels for Stafford Town.

*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

**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**

These issues are complex and should be explored at the Examination.



## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	Akzo Nobel UK Ltd c/o Jones Lang LaSalle (Mr Frazer Sandwith)
<b>Comment ID</b>	PS490
<b>Response Date</b>	28/02/13 10:12
<b>Consultation Point</b>	24 Policy C1 ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Akzo Nobel UK Ltd has no further comments to make on this Policy at this time.

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	Akzo Nobel UK Ltd c/o Jones Lang LaSalle (Mr Frazer Sandwith)
<b>Comment ID</b>	PS491
<b>Response Date</b>	28/02/13 10:12
<b>Consultation Point</b>	25 ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Akzo Nobel UK Ltd has no further comments to make on this Policy at this time.

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	Akzo Nobel UK Ltd c/o Jones Lang LaSalle (Mr Frazer Sandwith)
<b>Comment ID</b>	PS492
<b>Response Date</b>	28/02/13 10:12
<b>Consultation Point</b>	26 Policy C3 ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Akzo Nobel UK Ltd has no further comments to make on this Policy at this time.

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	Akzo Nobel UK Ltd c/o Jones Lang LaSalle (Mr Frazer Sandwith)
<b>Comment ID</b>	PS493
<b>Response Date</b>	28/02/13 10:12
<b>Consultation Point</b>	30 Policy C7 ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Paragraph 11.23 indicates that to address deficiencies in open space, sport and recreation provision the Council will seek financial contributions to deliver the Standards set out in the Open Space Assessment.

For the avoidance of doubt and to avoid double counting, Policy C7 or the supporting text should clarify that where the open space, sport and recreation provision is to be laid out and provided by the applicant/developer, it will be offset against the level of financial contribution which is sought.

**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.**

Redrafting of Policy C7 or paragraph 11.23 to clarify that where the open space, sport and recreation provision is to be laid out and provided by the applicant/developer, it will be offset against the level of financial contribution which is sought.

*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

**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**

If necessary to contribute to any discussion on this issue.

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	Akzo Nobel UK Ltd c/o Jones Lang LaSalle (Mr Frazer Sandwith)
<b>Comment ID</b>	PS494
<b>Response Date</b>	28/02/13 10:12
<b>Consultation Point</b>	21 Policy E8 ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Policy E8 is inconsistent with Policy Stafford 2, which requires the provision of a mix of uses including local retail facilities, social and physical infrastructure etc within the area of North Stafford identified on the Policies Map.

In order to be consistent and to ensure that The Plan For Stafford Borough is capable of being delivered, Policy E8 should recognise the potential for providing local centres and village or neighbourhood shops within the North Stafford Strategic Development Location.

**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.**

Redrafting of the identified Policy will be necessary to recognise the potential for providing local centres and village or neighbourhood shops within the North Stafford Strategic Development Location.

*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

**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**

To ensure that the issue can be properly debated.

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	Akzo Nobel UK Ltd c/o Jones Lang LaSalle (Mr Frazer Sandwith)
Comment ID	PS495
Response Date	28/02/13 10:12
Consultation Point	40 Policy I1 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Paragraph 13.1-13.24 Policy I1 indicates that 'New development that provides additional residential or commercial development will be supported by appropriate levels of physical, social and environmental infrastructure at a timely stage, as identified in the Infrastructure Delivery Plan....'. Akzo Nobel UK Ltd has already indicated in its representation to Policy 2 Stafford that (based on work carried out to date) it considers that the Strategic Development Location in North Stafford is capable of delivering the infrastructure requirements listed within that Policy. However, Paragraph 13.3 of The Plan For Stafford Borough indicates that the Infrastructure Delivery Plan will be updated. Akzo Nobel UK Ltd is concerned that subsequent reviews of the Infrastructure delivery Plan could place additional onerous and unreasonable requirements on developers that undermine the delivery of the Plan. Akzo Nobel UK Ltd requests that the Policy is redrafted to acknowledge that The Infrastructure Delivery Plan will be



kept under review and that the public and stakeholders will be afforded an opportunity to comment on and input into any subsequent updates.

**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.**

Akzo Nobel UK Ltd requests that Policy I1 is redrafted to acknowledge that The Infrastructure Delivery Plan will be kept under review and that the public and stakeholders will be afforded an opportunity to comment on and input into any subsequent updates.

*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

**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**

To contribute to any debate around this Policy or the supporting text.

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	Akzo Nobel UK Ltd c/o Jones Lang LaSalle (Mr Frazer Sandwith)
Comment ID	PS496
Response Date	28/02/13 10:12
Consultation Point	31 Policy N1 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Effective

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Minor amendment required.

Akzo Nobel UK Ltd has no further comments to make at this stage.

**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.**

Minor amendment to paragraph c (see underlining below)

*?...c. New development of ten dwellings or more should demonstrate compliance with the Building for Life 12 assessment and any successor documents, unless it makes the development unviable or it has been sufficiently demonstrated, through a Design & Access Statement, that each of the twelve Bfl questions has been optimally addressed, or conversely why it is not practical or appropriate to do so;.....'*

*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

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	Akzo Nobel UK Ltd c/o Jones Lang LaSalle (Mr Frazer Sandwith)
Comment ID	PS497
Response Date	28/02/13 10:12
Consultation Point	32 Policy N2 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Akzo Nobel UK Ltd is concerned that the proposed Code for Sustainable Homes and BREEAM Standards are not administered by the Council and could change over time, placing onerous and unreasonable requirements on developers with potential to undermine delivery of housing objectives.

We note that the Policy acknowledges that viability testing will be required if the achievement of BREEAM, Code for Sustainable Homes or onsite energy provision is considered to be unviable. However, the Policy does not actually confirm whether development will be acceptable if the achievement of BREEAM, Code for Sustainable Homes or onsite energy provision is unviable.

For the avoidance of doubt and to ensure that the Plan is positively prepared, the Policy should acknowledge that where the requirements are proven to render a development unviable, the need to

comply with standards will be waived having regard to the social, environmental and economic benefits of the scheme as well as consideration of Policy objectives.

**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 Policy should be redrafted to acknowledge that where the requirements are proven to render a development unviable, the need to comply with standards will be waived having regard to the social, environmental and economic benefits of the scheme as well as consideration of Policy objectives.

*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

**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**

If necessary to contribute to the debate on this issue.

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	Akzo Nobel UK Ltd c/o Jones Lang LaSalle (Mr Frazer Sandwith)
<b>Comment ID</b>	PS498
<b>Response Date</b>	28/02/13 10:12
<b>Consultation Point</b>	34 Policy N4 ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Akzo Nobel UK Ltd has no further comments to make on this Policy at this time.

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	Akzo Nobel UK Ltd c/o Jones Lang LaSalle (Mr Frazer Sandwith)
<b>Comment ID</b>	PS499
<b>Response Date</b>	28/02/13 10:12
<b>Consultation Point</b>	35 Policy N5 ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Akzo Nobel UK Ltd has no further comments to make on this Policy at this time.

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	Akzo Nobel UK Ltd c/o Jones Lang LaSalle (Mr Frazer Sandwith)
<b>Comment ID</b>	PS500
<b>Response Date</b>	28/02/13 10:12
<b>Consultation Point</b>	36 Policy N6 ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Akzo Nobel UK Ltd understands that the 'Cannock Chase Visitor Impact Mitigation Strategy' is in the process of being updated to review the nature of mitigation required to offset the expected increases in numbers of visitors to the SAC.

Policy N6 as drafted may not therefore be justified or effective. It also uses both Metric and Imperial measurements on an inconsistent basis. Stafford Borough Council should consider revising the Policy to reflect the findings of the updated work, to provide clarity on the thresholds for providing mitigation and the likely mitigation which is required.

Akzo Nobel UK Ltd reserves the right to carry out further analysis of the emerging evidence prior to the Examination.



**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.**

Stafford Borough Council should consider revising the Policy to reflect the findings of the updated 'Cannock Chase Visitor Impact Mitigation Strategy', to provide clarity on the thresholds for providing mitigation and the likely mitigation which is required.

Akzo Nobel UK Ltd reserves the right to carry out further analysis of the emerging evidence prior to the Examination.

*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

**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**

These issues should be explored at the Examination.

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	Akzo Nobel UK Ltd c/o Jones Lang LaSalle (Mr Frazer Sandwith)
<b>Comment ID</b>	PS501
<b>Response Date</b>	28/02/13 10:12
<b>Consultation Point</b>	2 SPATIAL PRINCIPLE 2 (SP2) ? STAFFORD BOROUGH HOUSING & EMPLOYMENT REQUIREMENTS ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The National Planning Policy Framework (NPPF) states (paragraph 47) that: "To boost significantly the supply of housing, local planning authorities should:

- . use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period..."

(most relevant points only, our underlining). Akzo Nobel UK Ltd is concerned that The Plan For Stafford Borough does not objectively assess housing need for the Borough or provide sufficient housing to meet housing needs in the area. Our comments are set out under the relevant headings below: Regional Spatial Strategy and Existing Shortfall Akzo Nobel UK Ltd is concerned that The Plan For Stafford Borough does not take into account evidence from the West Midlands Regional Spatial Strategy Phase 2 Revision Panel Report, which identifies a requirement 2006 to 2026 of 11,000 dwellings - or 550 dwellings per annum (excluding military housing). In a recent appeal decision for the Former Castle Works Site (APP/Y3425/A/12/2172968) in Stafford, the Inspector upheld the Appeal and concluded that as the Phase II Revision of the West Midlands Regional Spatial Strategy housing figures have been properly examined and the Government seeks to boost significantly the supply of housing, they are of significant weight in the consideration of housing land supply and would be more robust at this time, in advance of any up to date examined and adopted local plan. The Inspector concluded that in the 6 years over the period (2006 to 2012) house building rates in Stafford lagged behind the requirement to provide 550 dwellings per annum, causing a shortfall in housing provision of some 914 dwellings. He went on to conclude that to be consistent with Planning for Growth and paragraph 47 of the National Planning Policy Framework it would not be reasonable to ignore any shortfall already created. By adopting a start date of 2011, The Plan For Stafford Borough in effect writes of this shortfall. Akzo Nobel UK Ltd considers that if The Plan For Stafford Borough is to achieve its Vision of providing a range of housing types and tenures to meet the local needs of all communities and the aging population, such a shortfall cannot be ignored. The decision to do so is not, therefore, justified and is unsound. This unsoundness would be corrected by taking account of this shortfall in the overall Plan For Stafford Borough housing figure and increasing the number of new homes to be built over the Plan period by circa 914 dwellings. This approach would also be consistent with that recently taken by the Inspector in his Report on the Examination into Halton Core Strategy Local Plan.

#### Evidence Base

In addition to ignoring the current housing shortfall, the Council has decided not to accept the Regional Spatial Strategy Panel Report figure but has looked again at evidence provided by past completion rates, existing commitments and information from the Strategic Housing Land Availability Assessment to show the potential scope for supply, the 2010 based population projections and the 2008 based population and household projections over the Plan period, as well as other aspirations associated with future growth linked to employment. The Council has proposed a Policy figure of 500 dwellings per annum over the Plan period from 2011 to 2031.

Since The Plan For Stafford Borough has been prepared some of the 2011 Census data has been published, as well as interim 2011 based population projections. The 2010 based household projections are due to be published in March 2013 (at the earliest) and will take account of the Census data to provide a revised household growth estimate for the Borough that will supersede the 2008-based one.

A comparison of the trend based projections against the more recent Census indicates that they have underestimated the likely future population growth in Stafford Borough and therefore it is considered that the new post-Census long term projections, due to be released in the Spring, are likely to indicate greater future household growth. Akzo Nobel UK Ltd considers that if the Council continues to intend to meet all of the household growth identified for the Borough, it should adjust the annual dwelling requirement within The Plan For Stafford Borough once the revised estimates are published. Flexibility

Paragraph 14 of the NPPF states that "at the heart of the National Planning Policy Framework is a presumption in favour of sustainable development" which for plan making means "local planning authorities should positively seek opportunities to meet the development needs of their area" and Local Plans should "meet objectively set needs, with sufficient flexibility to adapt to rapid change..."

Akzo Nobel UK Ltd is concerned that the proposed housing requirement is inflexible. Akzo Nobel UK Ltd considers that to be effective, The Plan For Stafford Borough must demonstrate that it can robustly deal with changing circumstances and that any housing target should be expressed as a minimum not maximum.

This flexibility would inter alia provide greater opportunity to increase housing choice and deliver the Spatial Vision for a range of housing types and tenures to meet the local needs of all communities, including affordable housing, where there is an identified need (Strategic Housing Market Assessment) for 210 affordable houses per year.

**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.**

Redrafting of the identified Policy will be necessary to support a different new housing figure.

The housing target within The Plan For Stafford Borough should be increased to take account of the existing shortfall in the overall housing figure against the Phase II RSS Panel Report.

The Plan For Stafford Borough housing targets should be expressed as minimum not maximum.

The Council should adjust The Plan For Stafford Borough annual dwelling requirement once the revised post-Census long term projections are published. Akzo Nobel reserves the right to carry out further analysis of the evidence and identify what it considers to be an appropriate housing requirement prior to the Examination.

*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

**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 issues around housing land are complex and rely on a broad evidence base, which is drawn from many different sources and different spatial scales and for different purposes. It is necessary to explore them at the Examination.

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	Akzo Nobel UK Ltd c/o Jones Lang LaSalle (Mr Frazer Sandwith)
<b>Comment ID</b>	PS502
<b>Response Date</b>	28/02/13 10:12
<b>Consultation Point</b>	3 SPATIAL PRINCIPLE 3 (SP3) ? STAFFORD BOROUGH SUSTAINABLE SETTLEMENT HIERARCHY ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Akzo Nobel UK Ltd agrees with the Sustainable Settlement Hierarchy and in particular that the majority of new development should be delivered in the County Town of Stafford, at the top of the hierarchy. The County Town of Stafford is the largest settlement in the Borough and has the greatest level of services and facilities, jobs and transport links.

*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

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	Akzo Nobel UK Ltd c/o Jones Lang LaSalle (Mr Frazer Sandwith)
<b>Comment ID</b>	PS503
<b>Response Date</b>	28/02/13 10:12
<b>Consultation Point</b>	4 SPATIAL PRINCIPLE 4 (SP4) ? STAFFORD BOROUGH HOUSING GROWTH DISTRIBUTION ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	0.3

**Justified:** the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

**Do you consider that the Plan for Stafford Borough is Sound?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The proposed distribution of housing development in Stafford is:

? Stafford 72% ? Stone 8% ? Key Service Villages 12% ? Rest of Rural Area 8%

In principle, it is considered that the distribution of 72% of housing growth to Stafford Town is appropriate and in accordance with the key theme running through the National Planning Policy Framework of sustainable development. Stafford is the largest settlement in the Borough and has the greatest level of services and facilities, jobs and transport links.

*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



## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	Akzo Nobel UK Ltd c/o Jones Lang LaSalle (Mr Frazer Sandwith)
<b>Comment ID</b>	PS504
<b>Response Date</b>	28/02/13 10:12
<b>Consultation Point</b>	11 POLICY STAFFORD 4 ? EAST OF STAFFORD ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

We have identified in our representation to Policy Stafford 1 that the 5,500 new homes requirement for Stafford Town is not sound and that redrafting of that Policy will be necessary to support a different minimum and higher housing requirement for Stafford Town. Notwithstanding the above, The Plan For Stafford Borough also assumes, inter alia, that sustainable mixed use development of 600 homes will be delivered to the East of Stafford by 2031. Paragraph 173/174 of The National Planning Policy Framework places the onus upon the Local Planning Authority to demonstrate that the Local Plan can be delivered. In this context The Plan For Stafford Borough indicates, at paragraph 7.36 that based on current information from the Infrastructure Delivery Plan, and working in partnership with developers, it has been established that the scale of development is capable of delivering the infrastructure

requirements listed. We have no objection in principle to some development, or a Strategic Development Location to the east of Stafford. However, the evidence base indicates that there are infrastructure and sustainability challenges to the east of Stafford. Indeed, to the east of Stafford, the Plan acknowledges that the 600 houses currently proposed cannot be delivered without Phase 1 of the Eastern Access Improvement Scheme, between Weston Road (A518) in the north, and St Thomas Lane in the south. The Stage 1 Stafford Borough Infrastructure Strategy indicates that there are major funding and land ownership constraints associated with the delivery of the Eastern Access Improvement Scheme. Furthermore, it is not clear what Phase 1 of the Eastern Access Improvement Scheme could achieve in isolation. Without a detailed masterplan, which has been subject to consultation, it is not clear whether the Strategic Development Location is capable of being delivered. From the limited information available as documented in the Infrastructure Delivery Plan and evidence base, north Stafford performs better than east Stafford in terms of proximity to statutory designated ecological sites, impact on the historic environment and potential affects to views. Given the uncertainties about the delivery of the East of Stafford Strategic Development Location, we request that greater emphasis is placed upon north Stafford in The Plan For Stafford Borough. In line with the above, Akzo Nobel UK Ltd considers that its land holding is capable of accommodating a higher level of growth, to achieve the supply of new homes, than is currently proposed and that the boundary of the Strategic Development Location, to the north of Stafford, should be extended to include its full ownership boundary. This will help provide sufficient flexibility to ensure that The Plan For Stafford Borough meets the full objectively assessed needs for market and affordable housing.

Akzo Nobel UK Ltd is already currently working with adjacent land owners and has prepared a masterplan for the delivery of a high quality and sustainable development to the north of Stafford. Extensive public consultation has been carried out. The masterplan is being underpinned by technical information and supporting justification.

**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.**

Policy Stafford 4 and the supporting text and Plans should be redrafted provide flexibility to allow for alternative scenarios, where the scale of development proposed in east Stafford is unable to be delivered within the lifetime of the Plan. One option would be to increase the Strategic Development Location boundary to the north of Stafford to incorporate all of Akzo Nobel UK Ltd's landholding. This would also add further weight to our representations to Policy Stafford 2.

*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

**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**

These issues should be explored at the Examination.

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	Akzo Nobel UK Ltd c/o Jones Lang LaSalle (Mr Frazer Sandwith)
<b>Comment ID</b>	PS505
<b>Response Date</b>	28/02/13 10:12
<b>Consultation Point</b>	10 POLICY STAFFORD 3 ? WEST OF STAFFORD ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

We have identified in our representation to Policy Stafford 1 that the 5,500 new homes requirement for Stafford Town is not sound and that redrafting of that Policy will be necessary to support a different minimum and higher housing requirement for Stafford Town. Notwithstanding the above, The Plan For Stafford Borough also assumes, inter alia, that sustainable mixed use development of 2,200 homes will be delivered to the West of Stafford by 2031. Paragraph 173/174 of The National Planning Policy Framework places the onus upon the Local Planning Authority to demonstrate that the Local Plan can be delivered. In this context The Plan For Stafford Borough indicates, at paragraph 7.32 that based on current information from the Infrastructure Delivery Plan, and working in partnership with developers, it has been established that the scale of development is capable of delivering the infrastructure

requirements listed. We have no objection, in principle, to some development or a Strategic Development Location to the west of Stafford. However, the evidence base indicates that there are infrastructure and sustainability challenges to the west of Stafford. Indeed, the Plan acknowledges that the Strategic Development Location cannot be delivered without Phase 1 of the Western Access Improvement Scheme, which appears to be constrained by a railway line, the River Sow and Doxey Marsh - a Site of Special Scientific Interest (SSSI). Without a detailed masterplan, which has been subject to consultation, it is not clear whether the Strategic Development Location is capable of being delivered. From the limited information available, as documented in the Infrastructure Delivery Plan and evidence base, Akzo Nobel UK Ltd considers that north Stafford performs better than west Stafford in terms of proximity to statutory designated ecological sites, impact on the historic environment and potential affects to views. There are also likely to be fewer noise constraints to the north given the location of the M6 to the west. There are also flood risk issues to the west. Given the uncertainties about the delivery of the West Stafford Strategic Development Location, we request that greater emphasis is placed upon north Stafford in The Plan For Stafford Borough. In line with the above, Akzo Nobel UK Ltd considers that its land holding is capable of accommodating a higher level of growth to achieve the supply of new homes than is currently proposed and that the boundary of the Strategic Development Location to the north of Stafford should be extended to include its full ownership boundary. This will help provide sufficient flexibility to ensure that The Plan For Stafford Borough meets the full objectively assessed needs for market and affordable housing.

Akzo Nobel UK Ltd is already currently working with adjacent land owners and has prepared a masterplan for the delivery of a high quality and sustainable development to the north of Stafford. Extensive public consultation has been carried out. The masterplan is being underpinned by technical information and supporting justification.

**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.**

Policy Stafford 3 and the supporting text and Plans should be redrafted provide flexibility to allow for alternative scenarios, where the scale of development proposed in west Stafford is unable to be delivered within the lifetime of the Plan. One option would be to increase the Strategic Development Location boundary to the north of Stafford to incorporate all of Akzo Nobel UK Ltd's landholding. This would also add further weight to our representations to Policy Stafford 2.

*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

**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**

These issues should be explored at the Examination.

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	Akzo Nobel UK Ltd c/o Jones Lang LaSalle (Mr Frazer Sandwith)
<b>Comment ID</b>	PS506
<b>Response Date</b>	28/02/13 10:12
<b>Consultation Point</b>	7 SPATIAL PRINCIPLE 7 (SP7) ? SUPPORTING THE LOCATION OF NEW DEVELOPMENT ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	0.4

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Policy SP7 states (last sentence) that 'Only where insufficient sites on previously developed land, in sustainable locations, are available to meet new development requirements should greenfield land be released.'

Paragraph 7.3 of The Plan For Stafford Borough acknowledges that '..... there is insufficient land within the existing town to deliver the housing provision identified..' and that '...significant levels of new housing will be required on greenfield land on the edge of Stafford Town, to be delivered through the Strategic Development Locations...'

Akzo Nobel UK Ltd is concerned that Policy SP7 could, as drafted (and with the Plan's proposed reliance on the committed housing supply), prevent the Strategic Development Locations being brought forward in the early part of the Plan period, even if (as is the case with Akzo Nobel UK Ltd's land) they provide the best way of achieving sustainable development and the supply of new homes.

This approach would be inconsistent with Paragraph 52 of the National Planning Policy Framework, which states that:

'The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities. Working with the support of their communities, local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development....'

We have already identified in our representations to Policy SP2 and Paragraphs 6.50-6.54 that The Plan for Stafford Borough does not provide sufficient housing to meet the housing needs for Stafford Borough and that the Council should not overly rely on the delivery of the committed housing supply.

Furthermore, the committed housing supply, by itself, would fall well below the housing distribution targets set by Policy SP4.

In order to ensure that The Plan For Stafford Borough is justified and effective Akzo Nobel UK Ltd considers that Policy SP7 should clarify that the Strategic Development Locations which are capable of being brought forward in a sustainable way to facilitate housing delivery and the supply of new homes will be allowed to come forward during the early part of the Plan period.

**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.**

Policy SP7 should be redrafted to clarify that the Strategic Development Locations which are capable of being brought forward in a sustainable way to facilitate housing delivery and the supply of new homes will be allowed to come forward during the early part of the Plan period.

*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

**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**

To contribute to the debate on the issues which have been raised.

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	Akzo Nobel UK Ltd c/o Jones Lang LaSalle (Mr Frazer Sandwith)
<b>Comment ID</b>	PS508
<b>Response Date</b>	28/02/13 10:12
<b>Consultation Point</b>	8 POLICY STAFFORD 1 ? STAFFORD TOWN ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Akzo Nobel UK Ltd does not consider that the 5,500 new homes requirement for Stafford Town is sound.

We have identified in our representation to Policy SP2 that The Plan For Stafford Borough does not provide sufficient housing to meet housing needs within the Borough. Clearly, the implication of failing to provide for sufficient housing means that The Plan For Stafford Borough fails to make sufficient provision for housing development sites across the Borough, having regard to the housing growth distribution proposed in Policy SP4.

In this regard, if the overall quantum of housing which is proposed is deemed to be insufficient and not sound, it follows that the total requirement of new homes which is identified for the County Town of Stafford (7,200 homes) is also insufficient and therefore unsound.

We have also identified, in our representation to paragraphs 6.50-6.54 of the Plan For Stafford Borough that the approach to establishing the housing provision for Stafford Town (by subtracting 90% of current commitments from the total requirement for Stafford Town) is unsound. In line with the above, we consider that redrafting of the Policy will be necessary to support different minimum and higher housing requirement for Stafford Town.

Akzo Nobel UK Ltd endorses the identification of a Strategic Development Location for housing on part of its landholding in North Stafford. However, in our representation to Policy Stafford 2 we have identified that the whole of Akzo Nobel UK Ltd's landholding should be identified within the Strategic Development Location Boundary.

We have set out our comments in relation to the Strategic Development Locations to the West and East of Stafford in our representations to Policy Stafford 3 and Policy Stafford 4.

**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.**

Redrafting of the Policy and supporting text will be necessary to support different higher 'New provision' levels for Stafford Town and to reflect our comments in relation to Policy Stafford 2 Policy Stafford 3 and Policy Stafford 4 as well as on other relevant Policies.

*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

**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**

To contribute to the debate on the issues which have been raised.



## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	Akzo Nobel UK Ltd c/o Jones Lang LaSalle (Mr Frazer Sandwith)
<b>Comment ID</b>	PS509
<b>Response Date</b>	28/02/13 10:12
<b>Consultation Point</b>	9 POLICY STAFFORD 2 ? NORTH OF STAFFORD ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Akzo Nobel UK Ltd endorses the identification and inclusion of a Strategic Development Location for housing in North Stafford on part of its landholding. Akzo Nobel UK Ltd considers that the scale of housing currently proposed within the boundary of the Strategic Development Location for Housing on its land is deliverable, and (based on work carried out to date) together with the adjacent Strategic Development Locations in North Stafford, capable of delivering the infrastructure requirements listed within the Policy. However, Akzo Nobel UK Ltd does not consider that the requirement to deliver approximately 3,100 new in North Stafford is high enough. We have identified in our representation to Policy Stafford 1 that the 5,500 new homes requirement for Stafford Town is not sound and that redrafting of that Policy will be necessary to support a different minimum and higher housing requirement

for Stafford Town. It is our case that the most sustainable and deliverable direction of growth in Stafford Town is on the northern side and we request that greater emphasis is placed upon this in The Plan For Stafford Borough in order to achieve the supply of new homes. From the limited information available, as documented in The Plan For Stafford Borough, Infrastructure Delivery Plan and evidence base, we consider that north Stafford performs better than east and west Stafford in terms of proximity to statutory designated ecological sites, impact on the historic environment and potential affects to views. There are also likely to be fewer noise constraints to the north, given the location of the M6 to the west. We consider that it would be more justified and effective to focus a greater proportion of the overall growth of Stafford Town on Akzo Nobel UK Ltd's land and if appropriate, or deliverable, on the surrounding land to the north of Stafford. In light of the above, we do not consider that the Stafford North Concept Diagram and Strategic Development Location Boundary for Housing in North Stafford within The Plan For Stafford Borough provide the best way of achieving a sustainable mixed use development and meeting the supply of new homes within the Borough, Stafford Town and North Stafford. We request that the whole of Akzo Nobel UK Ltd's land is identified within the Strategic Development Location Boundary for housing. This will make full use of the infrastructure which will be provided by the recent approval on land to the south of Akzo Nobel UK Ltd's land<sup>1</sup> and round off the settlement as the first phase of an integrated urban extension. In this regard the Stafford North Concept Plan should also reflect the housing<sup>2</sup> and employment schemes<sup>3</sup> which have already been permitted within the Strategic Development Location. Akzo Nobel UK Ltd is currently working with adjacent land owners to prepare a masterplan for the delivery of a high quality and sustainable development to the north of Stafford. Akzo Nobel UK Ltd considers that the capacity of development which can be accommodated on its land holding will be determined as part of the masterplanning exercise which is being carried out.

A constraints and opportunities plan and masterplan proposals have been prepared by a multidisciplinary team of specialist consultants and extensive consultation has recently been carried out.

The masterplan demonstrates that the inclusion of Akzo Nobel UK Ltd's wider landholding will provide the best way to achieve the supply of new homes in Stafford Town and North Stafford whilst meeting the criteria for establishing Settlement Boundaries set out in Policy SP7 and helping to deliver the infrastructure required under the Policy. The masterplan is being underpinned by technical documents and supporting justification.

Akzo Nobel UK Ltd considers that housing development on its land is capable of being delivered on a stand-alone basis without prejudicing the overall strategy for North Stafford or the subsequent development of adjacent land. 1 Stafford Borough Council Planning Application Reference 10/13362/OUT 2 Stafford Borough Council Planning Application Reference 10/13362/OUT 3 Stafford Borough Council Planning Application Reference 12/17038OUT

**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.**

Akzo Nobel will complete the masterplanning exercise to set out what it considers to be a legally compliant and sound approach to the growth of North Stafford prior to the examination. The masterplan will be underpinned by technical information and supporting justification. Policy Stafford 2, the Development North of Stafford Town Diagram, the Stafford Town Key Diagram and the Stafford North Concept Diagram shall be amended to reflect the masterplanning work insofar as it relates to Akzo Nobel UK Ltd's land. Policy Stafford 2 shall be redrafted to support a different minimum and higher housing requirement for north Stafford.

Policy Stafford 2 should be redrafted to clarify that the new housing requirement for north Stafford is over and above the 409 dwellings already permitted within the Strategic Development Location.

*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

**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**

These issues are complex and should be explored at the Examination.



## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	Sainsburys Supermarkets Ltd ( )
<b>Comment ID</b>	PS510
<b>Response Date</b>	28/02/13 11:07
<b>Consultation Point</b>	8 POLICY STAFFORD 1 ? STAFFORD TOWN ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	0.3

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

We write on behalf of our client Sainsbury's Supermarkets Ltd and are instructed to submit comments on their behalf in respect of the above document. Sainsbury's has longstanding interests in the Borough, operating the Chell Road store in Stafford town centre. Nature of Comments Our comments relate to the following:

- . Policy Stafford 1: Stafford Town
- . Policy E8: Local, Town and Other Centres
- . Policy N2: Climate Change
- . Policy Stafford 1: Stafford Town

We support the encouragement given to expansion of the town centre in Policy Stafford 1, but we consider that this is not reflected in the proposed primary shopping area boundary. The Sainsbury's store is currently shown as immediately adjoining primary shopping area, within the town centre boundary. As a key anchor to the centre it should logically form part of the primary shopping area. The expansion of the store and its retail offer would help strengthen the town centre in line with the provision of Policy Stafford 1 and Policy E8 of the Publication document. Planning authorities are required to plan positively for development and to include the store within the primary shopping area would help facilitate development and enhance linkage to the primary shopping area, to deliver the plan's objectives.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Councillor Mrs Jean Tabernor
Comment ID	PS511
Response Date	27/02/13 14:00
Consultation Point	The Plan for Stafford Borough - Publication ( <a href="#">View</a> )
Status	Processed
Submission Type	Letter
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	Nicole Penfold
<b>Comment ID</b>	PS512
<b>Response Date</b>	28/02/13 10:12
<b>Consultation Point</b>	2 SPATIAL PRINCIPLE 2 (SP2) ? STAFFORD BOROUGH HOUSING & EMPLOYMENT REQUIREMENTS ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	0.3

**Justified:** the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

**Do you consider that the Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Policy SP 2, Policy C2, Policy SP4 Please see attached representations made by Gladman Developments and supporting report 'Stafford Borough: Proposed Housing Targets' prepared by Development Economics.

*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



# Stafford Borough: Proposed Housing Targets

18<sup>th</sup> February 2013

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## Introduction

1. The purpose of this brief note is to establish and assess the background to Stafford Borough Council's proposed housing target, as set out in the Council's Publication Local Plan.

## Policy Background

### Regional Strategy

2. The original regional strategy (2004) allocated 5,602 net dwellings to Stafford Borough over the 2001-2021 period, at an annual average of 280 dpa.
3. The revised West Midlands RSS (2006 Phase 2 Panel Report) which went to Examination (but was never adopted) identified an increase to a minimum of 11,000 dwellings over the 2006-2026 period (minimum of 550 dpa).

### SHMA

4. A bespoke SHMA was prepared for Stafford by Arc4 in 2012. The key findings are discussed under the heading Affordable Housing below.

### Local Plan Proposals

5. The Publication Local Plan proposes an annual average provision for 500 dpa stated as follows:

*Throughout the Borough, provision will be made for the development of 500 dwellings per year over the plan period, not including additional requirements for military housing, and provision for gypsies.*

6. The justification for this proposed policy appears to be ultimately based on CLG Household Projections, as the following extract from the Publication Local Plan makes clear:

*With regards to the future demand for new housing in the Stafford Borough area, national statistics from the Government provide information on population growth forecasts and the number of new households likely to form. For Stafford Borough, the latest 2010 population projections show an increase of 19,900 residents from 126,100 to 146,000 people in 2035. These figures include natural change and migration from other areas. The latest 2008 household projections to 2033 show an increase of 11,523 households, from 52,999 to 64,522 households who will be looking for houses in our area. **This is an average of approximately 500 new houses per year.***

(Publication Local Plan, paragraph 6.11, page 24, emphasis added)

7. The Publication Local Plan goes on to justify further the proposed policy as follows:

*It should be noted that the household projection figure is made up of 'local need' (i.e. natural change: the balance of births over deaths and reduction in average household size) and 'in-migration' elements, with the split for Stafford Borough being approximately 30% local need and 70% in-migration mainly from surrounding areas, the majority being from Cannock Chase District, South Staffordshire District and the City of Stoke-on-Trent. Recently the Government, through the NPPF, has stated that local authorities should provide for the locally assessed requirements of their area. **Pressures for continued in-migration are likely to remain from neighbouring areas in the short to medium term. In light of meeting objectively assessed needs it is sensible to plan for these**, not least because it is consistent with the growth aspirations for Stafford town, and its developing sub-regional role, as set out in the Spatial Vision and Key Objectives earlier. This approach has also been supported by neighbouring local authorities through recent Duty to Co-operate cross-border meetings on the Plan for Stafford Borough: Strategic Policy Choices document.*  
(Publication Local Plan, paragraph 6.12, page 24, emphases added)

8. These extracts establish the following principles in terms of the approach taken by the Council in developing a future housing target:

- the target is based on an assessment of likely future household formation as assessed by the CLG household projections
- the Council accept that future housing provision must take into account migration – and the role of Stafford within a sub-regional economy and labour market - as well as locally derived housing demand and need

9. That the Council has embraced these principles is to be welcomed. Our concern, however, is that the target as proposed is likely to be insufficient to accommodate the level of demand that demographic and economic trends are likely to generate. This statement is based on the evidence that has emerged from the 2011 census that has revealed much stronger levels of population growth in Stafford than the recent ONS/CLG projections have assumed, including the 2008-based household projections upon which the proposed Stafford housing target (as set out in the Publication Local Plan) is predicated.

10. The basis of this more recent evidence is summarised in later sections of this note.

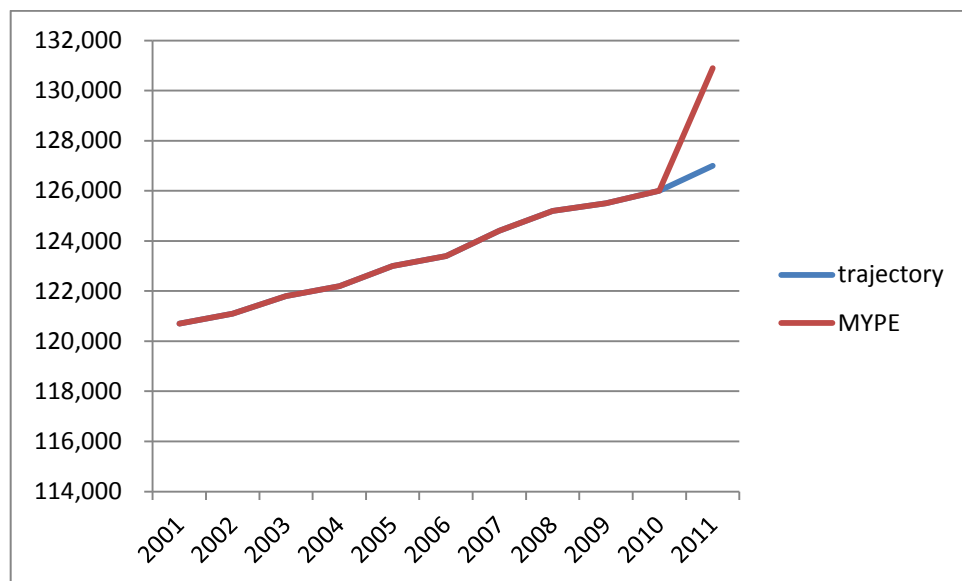
11. An additional concern regarding the setting of the proposed target is no allowance appears to be made for either existing affordable housing need backlog or newly arising need, as is required by the NPPF. This issue is also explored in a later section of this note.

## Demographic Drivers of Housing Demand

### *Census and MYPE*

12. The Census found that Stafford's population in 2011 was 130,879 persons. The population had increased by 8.4% over the 2001-2011 period. This was a much larger rate of increase than had occurred over the previous decade (1991-2001) where the population grew by only 1.0%.
13. In line with national trends, the largest share of the growing population is the over 65s. The number of working age people (16-64) grew in absolute terms (by around 5,260) but declined in percentage terms (from 65.9% to 64.8% of the total). In tandem, the median age in Stafford has increased (from 40 to 43) over the past decade.
14. The Census also found that the number of households in Stafford grew by around 11% over the past decade (to 55,700).
15. The annual mid-year population estimates (MYPE) for Stafford show a very interesting pattern that has important implications for the robustness of the Council's current housing target proposal. Between 2001 and 2010 the MYPE series had estimated an increase in population of 5,300 for Stafford, an average increase of 589 per year. However, the 2011 MYPE, which was informed by the Census, substantially adjusted upwards the increase in population over the 2001-2011 period to a total of 10,200, an average of 1,020 per year.
16. Most of the 'jump' in estimated population between the 2010 MYPE and the 2011 MYPE was the result of a recalibration of the estimates by ONS, in turn caused by a recognition (based on Census data) that the actual rate of population increase in Stafford between 2001 and 2011 had been much stronger than had hitherto been estimated.
17. In particular, the recalibration of MYPE in 2011 recognises that the average rate of population increase over the past decade in Stafford was around double the level that the ONS had been estimating until 2010. This also means that the population projections that have been estimated by ONS over the past decade have almost certainly under-estimated the likely rate of future increases for Stafford (see below).
18. The chart below illustrates the impact of the recent re-estimation of population change based on the update from the Census. The chart shows both the annual estimates for MYPE since 2001 – including the 2010 and 2011 MYPE. It also shows the level of MYPE that would have been

expected in 2011 had the same average estimated rate of change been maintained for one more year.



19. The key implication of the Census findings, therefore, are that all of the recent ONS population (and CLG household) projections for Stafford have been based on an under-estimation of the actual rate of population increase there over the past decade. This is important because the Council's proposed future housing target appears to be in large part based on the expected future rate of household formation as anticipated by the 2008-based CLG Household Projections.
20. For reasons elaborated upon below, the Council's proposed target now appears to be too low.

### ***Population Projections***

21. The 2010-based population projections anticipated that Stafford's population will rise from 126,100 (2010) to 143,500 (2031). This is an increase of 17,400 (13.8%). However, the Census has revealed that the population of Stafford was 130,879 in 2011, so the true level of population in 2010 was likely to have been in the order of just under 130,000. (That is, the 2010 based population projections are based on an underestimate of Stafford's population in the order of 4,000). However, the 2010 based population projections very probably significantly underestimate the likely future rate of increase of local population in Stafford..

### ***Household Projections***

22. The most recent household projections are based on the 2008-based population projections. The 2008-based population projections were even more cautious than the 2010-based

population projections already discussed: the 2008-based series anticipated a 2010 population of 126,800, and a 2031 population of 141,900. That is, an increase of 15,100 (11.9%) between 2010 and 2031.

23. The 2008-based household projections anticipate an increase in the number of households of around 10,000 over the 20 years to 2031. That is, an average of 500 per year. This is the estimate that the Council is planning for in setting its proposed housing target.
24. However, the 2011 Census has revealed that the true rate of population increase has been far greater for Stafford than had been assumed when the 2008-based population and household projections were being calculated.
25. The next set of household projections to be released will be the 2011-based ones, which are expected by the end of March 2013. These can be expected to show a significant increase in anticipated future population increase and household formation in Stafford compared to the levels expected by the 2008-based and 2010-based series.
26. In conclusion, therefore, the Council's proposed target is clearly based upon the 2008-based Household Projection from CLG. More recent demographic data confirms that the 2008-based projections were based on a serious under-estimation of population growth that occurred in Stafford over the past decade. The up-coming 2011-based household projections are likely to see a substantial upswing in the anticipated level of household formation in Stafford over the Plan Period. On this basis, the Council should be prepared to increase its housing target to take account of the more accurately based demographic trend predictions.

## Economic Drivers of Housing Demand

27. In general, the economy of Stafford performs better than most of its peers in Staffordshire and the wider West Midlands region. The following are some of the key characteristics of the Stafford economy and labour market.

### ***Business base and enterprise***

28. Stafford has just over 38 businesses per 1,000 population, placing it at around the 42<sup>nd</sup> percentile in comparison to other GB local authorities. In terms of new business registrations, Stafford does slightly better, and is at the 38<sup>th</sup> percentile compared to other GB local authority areas.

29. In terms of the proportion of business stock that is 'knowledge based' (OECD definition), Stafford performs less well, and is on the 50<sup>th</sup> percentile exactly.

### ***Employment base***

30. The local employment base includes the following characteristics:

- Below average representation of manufacturing compared to regional averages
- Significantly below average representation of financial and professional services compared to regional and national averages
- Proportions of employment in construction, transport and retail at about or just below regional averages
- Significantly greater proportions of employment in public services, including health and education.

31. The above-average importance of public sector employment is a potential weakness that may make Stafford more vulnerable to any further rounds of public sector austerity.

32. Balanced against this, however, Stafford is clearly part of a wider sub-regional labour market and there is a net outflow of daily commuting trips to neighbouring authority areas including Stoke, Cannock and Wolverhampton. This provides some measure of stability in terms of the availability of jobs.

### ***Labour force characteristics***

33. Levels of economic activity (81.0%) are high in Stafford compared to the regional average (74.6%). The level of employment is also very high (79.3%) compared to the West Midlands average (68.0%).

34. On average, Stafford residents tend to be better qualified than their regional counterparts and on average they earn more:

- In terms of qualifications, 36.4% of working age residents are educated to level NVQ4 or higher, compared to 26.3% across the West Midlands as a whole (and 32.9% nationally)
- A greater proportion of Stafford residents (42.2%) work in managerial and professional occupations compared to regional averages (39.3%), but the proportion is slightly lower than the national average (43.7%)

- In terms of earnings, in 2011 Stafford residents in full time work earned on average around 7% more than their regional counterparts. There has been an upwards trend in this ratio over the past decade: in 1995 Stafford residents earned on average 95% of regional average earnings.
- Higher levels of earnings in turn are likely to drive up relative house prices in Stafford and make it more difficult for those with significantly below average earnings to access to housing market.

### ***Travel to work patterns***

35. The 2001 census data reported that 68.2% of residents lived and worked in Stafford Borough and a further 27.6% worked elsewhere in the West Midlands (notably Stoke on Trent). Stafford is therefore part of a broader functional market which extends sub-regionally and particularly into Stoke on Trent.
36. More up-to-date commuting data from the 2011 Census is not expected until October 2013 at the earliest.

### ***Future employment growth***

37. The 2012 employment land study utilises economic forecasts (Cambridge Econometrics) that date back to 2006, and which pre-dates the credit crunch and associated recession. We are not aware of any more recent forecasts commissioned or used by the Council, and in our view the 2006-based forecasts are too dated to be of much practical use, particularly as they are blind to the implications of the global economic events of the past five years.
38. To address this shortcoming of the Council's evidence base, we have accessed more recent employment forecasts from Oxford Economics that date from May 2011. These forecasts – which post-date the credit crunch and the worst impacts of the recession – predict reasonably strong employment growth in Stafford over the period relevant to the Publication Local Plan (to 2031). In summary, the forecasts anticipate:
- overall growth in the employment base (2011-2031) of just over 3,800, representing growth of about 6.8%
  - the forecasts take into account the potential vulnerability of Stafford to job losses in the public sector in the short-to-medium term
  - the main source of employment growth is expected to be business and professional services

39. These more up-to-date forecasts confirm that economic (i.e. employment) growth will help underpin demand for housing over the Plan Period. In addition, the 2011 forecasts also anticipate continued growth in employment in the neighbouring districts, including the north Staffordshire conurbation, Cannock and Wolverhampton. Continued growth in employment opportunity in the wider sub-regional labour market will also serve to stimulate housing demand in Stafford.

## Affordability

40. A weakness of the Publication Local Plan proposals is that no allowance appears to have been made for the likely future trajectory of affordable housing need in the Borough. Neither does it appear that any allowance has been made to address the existing accumulated backlog of affordable housing need. Yet, there is ample evidence that both backlog and future arising need are important features of the current housing market, as evidenced by the Council's own SHMA of 2012. The key issues concerning affordability are addressed below.

### ***CLG Metrics of Relative Affordability***

41. CLG data confirms that affordability remains a problem in Stafford despite the downward trend on house prices since the advent of the credit crunch and associated recession. Data for 2010 (the 2011 data is still provisional and likely to be adjusted) indicates that the ratio of lower quartile house prices to lower quartile earnings is 6.45:1.00 in Stafford. This is the second largest ratio in Staffordshire (after South Staffordshire), and significantly greater than the regional average of 5.56:1.00.

### ***HSSA data***

42. Analysis of HSSA data from CLG suggests that housing waiting lists have lengthened in Stafford since 2007. The number on the list has increased from 1,688 (2007) to 2,850 (2011), an increase of 69%.

43. There was a drop in the number on the list from 2010 to 2011 (3,212 to 2,850). This decrease is likely to reflect changes in the way that the list is managed (e.g. the introduction of Choice Based Lettings, which in many local authority areas has prompted a re-registration of applicants, and a temporary drop in applicants while the switchover happened).



### **SHMA assessment**

44. A bespoke Stafford SHMA was produced for the Council by Arc4 in 2012. The key findings include the following:

- **Current Need:** the existing (2012) current housing need is estimated at 1,013 households
- **Future households requiring affordable housing:** the 2012 SHMA update estimated the future rate of household formation to be 955 per year. Of these, the SHMA estimates that 234 households per year will require affordable housing, with an additional 19 households falling into need. Hence, future need is estimated to be 253 households per year.
- **Annual supply of affordable housing:** estimated likely to be 313 dpa.
- **Backlog of need:** the total backlog of need is estimated to be 450 units.
- **Net annual shortfall** Assuming reduction of backlog over 5 years, the annual net shortfall is estimated by Arc4 to be 210 dpa.

45. **Future households requiring market housing:** the SHMA also estimates that 350 households will require market housing. This is based on a simplistic approach, i.e. net increase in the number of households (from CLG projections) = 500 p.a. (and which is also the Council's proposed housing delivery target) multiplied by the target proportion of non-affordable housing (65%) = 350 p.a.

46. The main weaknesses of the SHMA are two-fold with respect to the approach to market housing are as follows:

- The approach is driven by the implications of the Council's proposed affordable housing policy (in terms of the use of the 35% target), hence it is policy rather than evidence based, contrary to the requirements of the NPPF.
- The approach is also underpinned by the use of CLG Household Projections, which are likely to be a significant under-estimate of future rates of household formation in Stafford. This is because the approach is reliant on the 2008-based household projections from CLG, which as we have already said, are based on a significant under-estimation of the actual level of population in Stafford in 2010 & 2011 and the rate at which Stafford's population has increased since 2001.
- On this basis, the estimates of future market housing demand arrived at by the SHMA are likely to also be under-estimated.

## Conclusion

47. In setting its housing target the Council has accepted the need to allow for both locally derived housing demand and demand that arises from migration pressures.
48. Although this stance is to be supported, the Council is currently relying on flawed household projections to set its target. The 2008-based projections have been revealed by the 2011 Census to have been based on an under-estimation of the true extent of population growth in Stafford over the 2001-2011 period.
49. The revised, 2011-based projections are due imminently (by the end of March 2013). These revised projections should be used by the Council to help re-calibrate its proposed housing target.
50. However, in re-setting its overall target the Council must also take account of the backlog of affordable housing need and the likely levels of newly arising need, as revealed by its 2012 SHMA update. It is not clear currently how, if at all, the quantification of existing and likely future affordable housing need has informed the setting of the Council's proposed housing target, yet it is an explicit requirement of the NPPF that affordable housing need should be taken into account.

**Gladman Developments Ltd**

**Representations on  
Stafford Borough Council – Publication Local Plan**



**February 2013**

# 1 INTRODUCTION

1.1.1 Gladman specialise in the promotion of strategic land for residential development with associated community infrastructure.

1.1.2 These representations have considered **Stafford Borough Council’s Publication Local Plan** with particular focus on the quantum of housing proposed, the spatial distribution of growth, the evidence base used to justify this and whether the Local Plan complies with requirements set out in the National Planning Policy Framework (from here on referred to as the Framework).

1.1.3 These representations have been structured as follows:

- National Planning Policy Framework
- Housing requirement
- Spatial Distribution
- Evidence base
- Summary

1.1.4 In support of these representations Gladman have commissioned Development Economics to produce a brief report assessing the background to Stafford Borough **Council’s proposed** housing targets. References to the key findings from the Development Economics report have been made within these representations and the full report has been submitted as a supporting document. The Development Economics report has been structured around the three components that need to be considered when determining the appropriate level for housing requirements; 1) demographic drivers of housing demand, 2) economic drivers of housing demand and 3) the affordable housing need.

## 2 NATIONAL PLANNING POLICY FRAMEWORK

2.1.1 The whole tone of the Framework is centred on delivering sustainable development and there is a clear recognition that development means growth. §14 of the Framework states:

*"At the heart of the National Planning Policy Framework is a **presumption in favour of sustainable development**, which should be seen as a golden thread running through both plan-making and decision-taking.*

*For plan-making this means that:*

- *local planning authorities should positively seek opportunities to meet the development needs of their area;*
- *Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:*
  - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
  - *specific policies in this Framework indicate development **should be restricted.**"*

2.1.2 The Framework requires that the supply of housing needs to be significantly boosted and that local planning authorities should use their evidence base to ensure that their Local Plan meets the "**full, objectively assessed needs for market and affordable housing**" in the housing area (§47 of the Framework).

2.1.3 §152 of the Framework has regard to the preparation of Local Plans, and states:

*"Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, **compensatory measures may be appropriate.**"*

2.1.4 §158 of the Framework goes on to state:

*"Each local planning authority should ensure that the Local Plan is based on adequate up to date and relevant evidence...Local planning authorities should ensure that their assessment of and strategies for housing , employment and*

*other uses are integrated, and that they take full account of relevant market and economic signals.”*

2.1.5 §159 of the Framework states:

*“Local planning authorities should have a clear understanding of housing needs in their area. They should:*

- *Prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing markets cross administrative boundaries...”*

2.1.6 Having regard to the examination of Local Plans, §182 of the Framework sets 4 criteria for a plan to be found “sound”. This includes a requirement for the plan to be ‘consistent with national policy’ and states that the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

2.1.7 It is imperative that the Stafford Borough Council Local Plan embraces the **Framework’s** aspirations to facilitate growth. This is particularly relevant when considering the quantum of residential development to be delivered during the plan period. Gladman believe that in its current form the Stafford Borough Council Publication Local Plan is contrary to the Framework on a number of counts (along with failing to meet the other three tests; positively prepared, effective and justified) and therefore should be found unsound.

### **3 HOUSING REQUIREMENT**

#### **3.1.1 Quantum of housing**

The whole tone of NPPF is centred on delivering sustainable development and there is clear recognition that development means growth. In order to ensure that this is delivered, the Framework highlights that **the supply of housing needs to be significantly boosted** and that local planning authorities should use their evidence base to ensure that their Local Plan meets the **full, objectively assessed needs for market and affordable housing** in the area (Framework §47). The starting point for achieving this objective is the preparation of a Strategic Housing Market Assessment (SHMA) which should assess the full housing needs of the area.

3.1.2 When determining the local housing requirement the Council should be considering the three elements / drivers for housing demand; demographic, economic and social (affordability). This requirement is set out in various elements of the Framework. Paragraph 159 of the Framework makes specific reference to the assessment of housing need taking

into consideration household and population projects. Paragraph 158 refers to the need for assessments of future land uses, including housing, to take account of economic signals and paragraph 47 of the Framework requires that the assessment of future housing requirement takes into account the full, objectively assessed needs for **both market and affordable housing**.

3.1.3 **Policy SP2** details the proposed housing and employment requirements in Stafford Borough. The proposed housing requirement is 500 dwellings per year over the plan period (2011-2031). This would equate to 10,000 new homes over the plan period.

3.1.4 Gladman raise significant concerns in relation to the proposed housing requirement and **whether this represents the 'full, objectively assessed needs'**. In determining the proposed housing requirement it is unclear whether the Council have given the required consideration to all the factors which affect housing need (demographic, economic and social). Further to this, as detailed later in these representations and supporting report, the evidence base used to determine the housing requirement is significantly flawed and as a result of this, the proposed requirement is based on an under-estimate of market housing need.

3.1.5 The Council do not appear to be taking a positive approach in relation to housing growth **and as such Gladman question whether the Local Plan meets the 'positively prepared'** element of the test of soundness outlined in paragraph 182 of the Framework.

3.1.6 If the housing target taken forward cannot address the identified local needs then the Local Authority is in effect planning to fail. Housing need will not be satisfied and growth constrained if Stafford Borough Council do not adopt an appropriate housing target based on the objectively assessed need. Further adverse consequences of not meeting the identified need could include:

- The outward migration of people who currently live in Stafford Borough due to the lack of available and suitable affordable homes;
- Slow growth of the local economy resulting from a limited local population to support the viability and vitality of local shops, businesses, leisure assets and educational establishments;
- The loss of economic benefits created by housing, including work for the local labour force; and

### 3.1.7 **Shortfall in housing delivery**

Many authorities have consistently under-provided against targets set out in the adopted RSS. These documents were subject to significant scrutiny and were found to be based on

robust evidence. Therefore if the local planning authority has not provided sufficient homes to meet their RSS target, then there is a need to ensure that the housing requirement in the forthcoming Local Plan / Core Strategy includes an element to address this backlog.

3.1.8 In relation to past housing delivery Gladman suggest that this should be calculated against the requirements set within the 2006 Phase 2 Panel report for the West Midlands RSS. Whilst it is recognised that this plan never reached adoption it provides the latest assessed housing requirements and progressed a significant way through the process. Due to this Gladman believe that the 2006 RSS proposed housing requirements should carry significant weight.

3.1.9 The 2006 draft RSS proposed an annual target for Stafford of 550 dwellings. Against this target for the period 2006-2011/11 there is a shortfall in delivery of 914 units. The Council claim to have been working to the previous RSS target of 280, which would result in an oversupply of over 1200 units. Gladman have concerns over this approach, particularly in relation to the significant uplift in housing numbers proposed through the 2006 draft RSS. Gladman would recommend that this figure (550 dpa target) should be taken into consideration as the 2006 Draft RSS represents the most up to date evidence of housing need for Stafford was based on a significant and robust evidence base. As such the shortfall in housing delivery against this should be factored into housing requirements moving forwards.

### **3.1.10 Affordable Housing**

3.1.11 The provision of affordable housing is a key priority for most local planning authorities. However, the only way to improve affordability is to provide housing. If the evidence base suggest that a certain level of affordable housing is required and the authority are not seeking to address that need in full through the Local Plan, then the only possible result is that the affordability gap will get worse. Local Plan housing requirements should therefore reflect the full need for affordable housing provision, as required by §47 of the Framework, if addressing affordability is to be achieved.

3.1.12 **Policy C2** of the Publication Local Plan outlines the proposed affordable housing requirement as follows:

- At Stone, Eccleshall, Gnosall, Woodseaves, Barlaston, Tittensor and Yarnfield – a target of 40% on sites greater than the thresholds detailed in this policy
- In Stafford Town and all other areas of the Borough – a target of 30% affordable housing on sites greater than the defined threshold.



3.1.13 Gladman raise significant concerns in relation to the ability of the Council to deliver a 40% affordable housing requirement within certain settlements (as set out in policy C2) due to viability issues. Gladman believe that further updated and detailed viability work should be undertaken in order to determine whether this requirement is appropriate. If the Local Plan is not deliverable it should not be found sound, as it does not meet the tests outlined in paragraph 182 of the Framework, namely **that it is not 'effective'** Similarly if policies contained in the Local Plan are not deliverable they will not be in conformity with paragraph 173 of the Framework, which looks to ensure viability and deliverability in plan making and decision taking.

**3.1.14 Development Economic Report – Stafford Borough: Proposed Housing Targets**

Development Economic were appointed by Gladman to undertake an assessment of the proposed housing target in Stafford Borough to be provided in support of these representations. The purpose of this note was to assess the background to Stafford **Borough Council's proposed housing target**. The full report has been submitted to the Council along with these representations.

- 3.1.15 The key conclusions made within the Development Economics report are as follows:
- In setting its housing target the Council has accepted the need to allow for both locally derived housing demand and demand that arises from migration pressures.
  - Although this stance is to be supported, the Council is currently relying on flawed household projections to set its targets. The 2008 based projections have been revealed by the 2011 Census to have been based on an under-estimation of the true extent of population growth in Stafford over the 2001-2011 period.
  - The revised, 2011 based projections are due imminently (by the end of March 2013). These revised projections should be used by the Council to re-calibrate its proposed housing target.
  - However, in setting its overall target the Council must also take account of the backlog of affordable housing need and the likely levels of newly arising need, as revealed by its 2012 SHMA update. It is not clear currently how, if at all, the quantification of existing and likely future affordable housing need has informed the **setting of the Council's proposed housing target, yet it is an explicit** requirement of the NPPF (paragraph 47) that affordable housing need should be taken into account.

### 3.1.16 **Offsetting a falling working age population**

In many local authority areas the population is ageing. Working populations are falling and as a result, employers have to look further afield for their workforce. As noted in the Development Economics report, the largest share of the growing population in Stafford Borough is the over 65's. The number of working age people declined in percentage terms (from 65.9% to 64.8%) Therefore the evidence base and subsequent housing targets should factor in the need for additional households that would be required to offset the loss of working age population. In addition areas that have traditionally been attractive to an ageing population will continue to be so which will mean that a proportion of new housing will be inhabited by the non-working age population.

## 4 **SPATIAL DISTRIBUTION**

4.1.1 In terms of Spatial Distribution, your authority has a number of different and distinct housing market areas. Each of these distinct areas will have their own requirement for housing and this should be reflected in the spatial distribution of housing supply within the Local Plan. This decision should be based on the findings of the evidence base and should not be a politically driven spatial strategy to put a disproportionate amount of housing in areas where people do not want to (and will not) live. If the spatial distribution does not reflect need/demand as shown by the evidence base, then the housing will not be delivered and the Plan will not be implemented.

4.1.2 **Policy SP3** details the settlement hierarchy for the Borough as follows:

- County town of Stafford
- Market town of Stone
- Key Service Villages of Eccleshall, Gnosall, Hixon, Great Haywood, Little Haywood / Colwich, Haughton, Weston, Woodseaves, Barlaston, Tittensor and Yarnfield.

4.1.3 Building on the above settlement hierarchy **Policy SP4** of the Local Plan Publication Draft outlines the distribution of housing growth as follows:

- Stafford: 72%
- Stone: 8%
- Key Service Villages: 12%
- Rest of rural area: 8%

4.1.4 Within the Local Plan Publication Draft the Council outline how a number of factors were considered in order to determine the distribution of housing growth across the borough. These considerations and the proposed distribution are shown in the table below.

	<b>Proposals in Local Plan Publication Draft</b>	<b>2001 population distribution</b>	<b>Stafford Borough Local Plan 2001</b>	<b>Completions 2001-present</b>
<b>Stafford</b>	72%	52%	78%	48%
<b>Stone</b>	8%	12%	17%	17%
<b>Key Service Villages</b>	12%	16%	5%	35%
<b>Rest of the Borough</b>	8%	20%		

- 4.1.5 The Council claim that the proposed distribution has been determined in order to ensure that the distribution of development is delivered to reflect the level of services and facilities available through the Sustainable Settlements Hierarchy. The distribution represents a return to the proportions intended by the previous Stafford Borough Local Plan, but modified to reflect current circumstances and the growth aspirations for Stafford Town.
- 4.1.6 The Framework promotes that the purpose of the planning system is to contribute to the achievement of sustainable development. The delivery of growth to key settlements with established sustainability credentials would create sustainable communities that have good access to a range of jobs, housing, community facilities and key services and infrastructure. It is recognised that it will not be possible for all development to be accommodated within the main settlements and therefore some development, appropriately designed and of a scale and kind that is befitting of the rural villages should be encouraged. This will help to sustain village life and breathe impetus into the rural communities and provide much needed affordable housing
- 4.1.7 Gladman raise concerns in relation to the spatial distribution outlined in Policy SP4. In particular Gladman would query whether an over reliance is being placed on Stafford (72% of growth). If the numbers proposed to Stafford do not deliver then the plan as a whole will not be implemented. In relation to the test of soundness outlined in paragraph 182 of the Framework, **in order to be 'effective' the plan must be deliverable.**
- 4.1.8 Gladman suggest that additional consideration should be given to the spatial strategy and that there may be the potential for further growth in the smaller sustainable settlements than is being proposed through the distribution outlined in policy SP4. This should be seen as a positive approach for some of the smaller sustainable settlements as it would help to sustain the existing services and facilities and potentially bring additional facilities to these areas. Developments within these smaller settlements, as opposed to the large strategic development locations, may also help to deliver much need housing in the short to medium term and provide housing to meet the specific needs of these individual areas and of the local people.

- 4.1.9 A further concern Gladman raise, linked to the previously mentioned over reliance on Stafford, is that a large proportion of the proposed housing requirement is expected to be delivered through large Strategic Development Locations (both in Stafford and Stone). In principle, Gladman support these types of developments as they are in line with a number of key objectives of the Framework in relation to the delivery of Sustainable Development. However, Gladman’s concerns are in relation to the deliverability of such sites and whether realistic delivery timescales and lead in times have been factored in to the trajectory in relation to these sites. Large Scale developments, such as the north Stafford SDL (proposing 3,100 homes) are likely to require significant infrastructure prior to delivery and therefore significant lead in times need to be factored in to the proposals. Gladman would **recommend that alongside these large SDL’s**, the Council should be proposing further growth through small/medium sized sites which often require a lesser degree of infrastructure improvements and as such have the potential to deliver over a shorter time period.
- 4.1.10 Gladman note that if **just one of these SDL’s were not to come forward, this would have a** significant impact on the number of units that could come forward as a result of the Local Plan. In this **sense Gladman have concerns in relation to ‘effectiveness’** of the Local Plan and its ability to deliver.

## 5 EVIDENCE BASE

- 5.1.1 When identifying housing need (for market and affordable dwellings), the Framework is explicit with regards to the need for Local Plans to be *“based on adequate, up-to-date and relevant evidence”* (Framework §158). With specific reference to housing the Framework states that Local Planning Authorities should:

*“Prepare a Strategic Housing Market Assessment to assess their full housing needs. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:*

- Meets household and population projections, taking account of migration and demographic change”* (Framework §159)

- 5.1.2 Gladman acknowledge that Stafford Borough Council commissioned ARC4 to produce an update to their SHMA in 2012. Whilst on the surface this would suggest that the evidence base in relation to housing need is up to date, Gladman would argue that this evidence base is significantly flawed and as such the proposed housing requirement is **‘unsound’ and thus** needs further detailed consideration.

5.1.3 As highlighted through the supporting Development Economics report to two main shortfalls of the 2012 SHMA are as follows:

- The approach to determine future housing need is driven by the implications of **the Council's proposed affordable housing policy**, hence it is a policy led approach rather than evidence based led. This is contrary to the requirements of the Framework.
- The approach is also underpinned by the use of CLG Household Projections, which are likely to be significant under-estimates of future rates of household formation in Stafford. This is because the approach is reliant on the 2008-based household projections from CLG, which as detailed in the supporting report, are based on significant under-estimation of the actual level of population in Stafford in 2010 and 2011 and the rate at which **Stafford's population has increased** since 2001.

5.1.4 On the basis of the deficiencies identified above, the estimates of future market housing demand arrived at by the SHMA are likely to also be significant underestimates. Thus the housing requirements proposed through the Local Plan are arbitrarily low and will not meet the *'full, objectively assessed needs for market and affordable housing'* as required by paragraph 47 of the Framework. This means that the Local Plan as it is proposed is unsound.

## 6 DUTY TO COOPERATE

6.1.1 It is fundamental that the Council through its Local Plan exercise their Duty to Cooperate as set out in §110 of the Localism Act and 181 of the Framework. This requires that if the needs of the authority cannot be fully met within their own area then the surrounding authorities agree to accommodate the shortfall or, if the surrounding authorities cannot meet their full need, then the shortfall is picked up within your authority.

6.1.2 Gladman raise concerns in relation to the Duty to Cooperate and query whether the Local Plan meets these requirements. In particular Gladman raises concerns in relation to the proposed housing numbers across the wider West Midlands area.

## 7 SUMMARY

7.1.1 Gladman consider that all of the factors detailed in these representations and the supporting document should be taken into consideration by the Borough Council when progressing with the Local Plan. If the concerns identified, in particular in relation to the proposed quantum

of housing and flawed evidence base, are not addressed, then the Local Plan should be found 'unsound' at Examination.

7.1.2 Gladman believe that the soundness of the Local Plan is questionable on a number of counts:

- Quantum of housing – Due to the flawed evidence base it is unclear whether the proposed housing requirement will meet the full objectively assessed needs for housing as required by the Framework. It is likely that due to the under-estimates referred to in the 2012 SHMA that the proposed requirement is arbitrarily low. Gladman query whether in determining the housing need for Stafford, the Council have taken account of all of the drivers of demand (demographic, economic and affordability). In relation to the quantum of housing proposed Gladman question **whether the Local Plan is 'positively prepared' or 'consistent with national policy'**.
- Affordable housing – Gladman raise significant concerns in relation to the 40% requirement for affordable housing in certain settlements (as outlined in policy C2). This element of the **Local Plan is not 'effective' as it is not clear that it will be deliverable** due to viability issues. In relation to this Gladman would recommend that further viability work should be undertaken to ensure that the proposals are deliverable.
- Spatial distribution – Gladman raise concerns in relation to an over reliance being placed on Stafford, and further to this the issue of lead in times and deliverability of large Strategic Development Locations over the plan period. Gladman recommend that the Council should be directing a greater degree of growth to smaller yet still sustainable settlements in the early part of the plan period that could help meet housing requirements in the short to medium term. In line with aspirations of the Framework, growth should be accommodated in sustainable locations and should not be restricted by arbitrarily low housing targets or limits.
- Evidence base – The 2012 SHMA, providing the evidence base for the housing requirement in the Local Plan, is significantly flawed. As a result of this the proposals within the **Local Plan are not 'justified'** and are unsound. The SHMA should be updated to accord with the methodology outlined in paragraphs 159, 152 and 14 of the Framework.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	First City Limited (Mr Graham Fergus)
Comment ID	PS513
Response Date	27/02/13 15:13
Consultation Point	11 POLICY STAFFORD 4 ? EAST OF STAFFORD ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.5
Files	<a href="#">First City East Stafford Delivery Statement UPDATE.pdf</a>

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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough 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

**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**

Our representation is fundamental to the delivery of this part of the spatial strategy and in turn the soundness of the Plan. Our participation at the examination is vital for the issue to be considered fully. We have prepared a Delivery Statement to aid consideration of the matter at the examination. This is provided under separate cover.



**POLICY STAFFORD 4  
EAST OF STAFFORD STRATEGIC  
LOCATION**

**DELIVERY STATEMENT**

On behalf of:  
**Mr Boote, Mr Evans and Mr C & Mrs E Stott**

Prepared by:



**First City Limited  
First City House  
19 Waterloo Road  
Wolverhampton  
WV1 4DY**

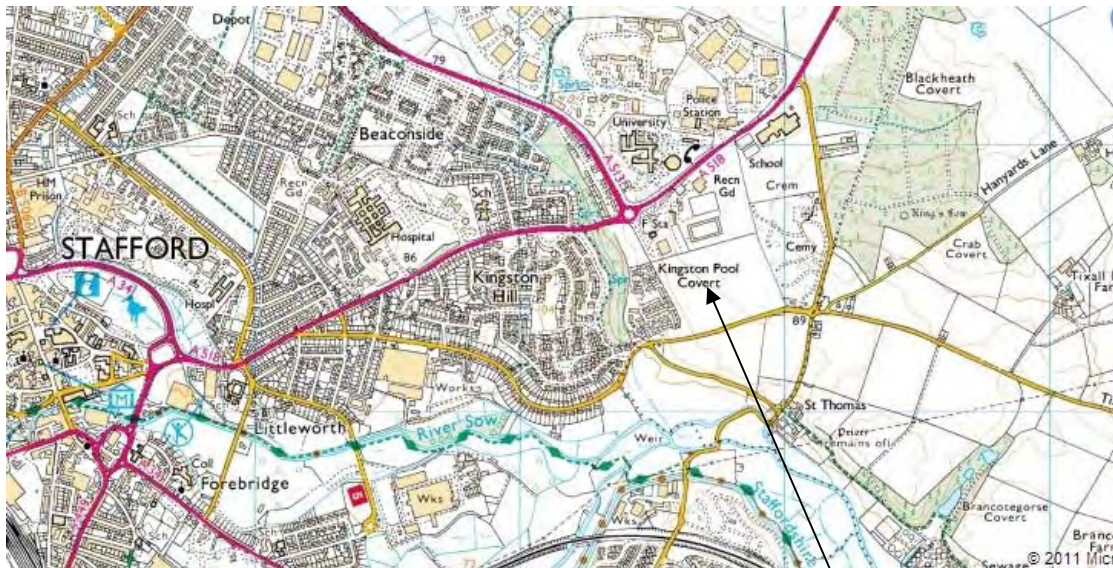
**Email: [firstcity@firstcity.co.uk](mailto:firstcity@firstcity.co.uk)**

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- 2.0 CONCEPT RATIONALE
- 3.0 STRATEGIC DEVELOPMENT LOCATION - EAST OF STAFFORD -  
CONCEPT STATEMENT
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- 5.0 INFRASTRUCTURE
  - Physical Infrastructure
  - Social and Community Infrastructure
  - Green Infrastructure
  - Management and Community Engagement
  - Table 1 Strategic Development Location – East of Stafford - Infrastructure
  - Table 2 Strategic Development Location – East of Stafford - Phasing

INTRODUCTION

- 1.1 This delivery statement has been produced to provide details of the development of land at the “East of Stafford” Strategic Development Location. The land is identified within the Stafford Borough Plan Policy Core Policy Stafford 4 a key part of one of three Strategic Development Locations (SDL) to provide the new homes needed in the Borough over the Plan period to 2031.
- 1.2 East of Stafford, as the site is referred to within the The Plan for Stafford Borough, under Core Policy 4 - East of Stafford, is proposed for the development to take a ‘neighbourhood’ approach with the delivery of approximately 600 new homes, subject to the provision of phase 1 of the Eastern Distributor Road through a mix of housing types, tenures, sizes and styles with 30% affordable housing, open space and landscaping.
- 1.3 The Core Area is approximately 23 hectares and lies on either side of Tixall Road. It is bordered by Stafford University Campus to the north and St Thomas Lane to the south, residential properties to the west and Stafford crematorium/ Blackheath Lane to the east.
- 1.4 The aim of this document is to provide details of the key deliverables and phasing schedule of the development north of Tixall Road. A full suite of supporting technical documents has been prepared in support of this proposal. These include specialist reports on transportation, flood risk, ground conditions, drainage, agricultural land quality, noise and vibration, air quality, ecology and visual and landscape assessment. The overall conclusion of these reports is that the proposed development of this Core Area is appropriate and deliverable.



The Site

### CONCEPT RATIONALE

- 2.1 The site will form the heart of the strategic development location to the east of Stafford. It is important to ensure excellent connections with the existing settlement, balancing sustainable development principles with the need to make efficient use of land and having regard to the character of the surrounding area, the topography of the site landscape and ecological interests.
- 2.2 To achieve this an illustrative Master plan has been prepared, taking account of the evidence base documents and recommendations to confirm, the land uses to be accommodated including housing to provide a mix of dwelling types and sizes, including affordable housing and housing to meet the needs of an aging population through new extra care and specialist housing, together with the social, physical and health facilities infrastructure included in the development.
- 2.3 The precise layout of the development will be confirmed through planning permissions that are in the course of preparation. These are guided by a balanced view of the physical capacity of the site considering the quantity of buildings required and the desired character of the development in relation to its surroundings in terms of existing surrounding developments and the landscape.
- 2.4 The development will have regard to the semi rural setting, which requires a design response to ensure the development is integrated into the landscape, taking account of natural features, existing vegetation and provision of appropriate new landscaping.
- 2.5 In the design of the housing layout the needs of people will be placed before traffic movement. The development will create new places that connect with each other sustainably by providing conditions to encourage walking, cycling and the use of public transport.
- 2.6 The development will deliver the Eastern Access Improvement Phase 1 south from Hydrant Way.

### STRATEGIC DEVELOPMENT LOCATION AT EAST STAFFORD – MASTER PLAN

- 3.1 The concept statement that has supported recent stakeholder and public consultation ( a copy of which is attached at Appendix A) provides further details in support of the East of Stafford Strategic Development Location and the key elements for the core area are reflected on the Indicative Master Plan.

Strategic objectives for the Strategic Development Location:

- Major housing development north and south of Tixall Road of approximately 600 dwellings including affordable housing and provisions to meet the needs of an ageing population through new extra care and specialist housing;

- Comprehensive links to the proposed 20 hectare employment land development at Beacon Hill;
- Delivery of the Eastern Access Improvement Scheme and associated transport improvements from Weston Road to St Thomas' Lane;
- Green infrastructure improvements and the retention of existing hedgerows and trees to support the provision of a network of green infrastructure;

### KEY DESIGN PRINCIPLES

- 4.1 A Master plan for the whole site has been produced to demonstrate adherence to current best practice in urban design and specific further design guidance will be provided to support reserved matter applications. The design strategy will include:
- a) The extent to which the built form responds to the topography of the site.
  - b) A landscape framework and planting strategy produced as a driver for the layout that integrates the development within the landscape and shows how the new urban edge will be formed and managed. This will demonstrate how existing trees and hedgerows will be retained, incorporated and extended as part of the proposed organisation of built form.
  - c) A strategy for new planting should demonstrate integration throughout the new development, clearly explaining how the countryside can be drawn into the proposed development through the integration of multi-functional green spaces. The strategy demonstrates how the urban extension can be produced to be visually distinctive, but also robust in terms of climate change, encouraging alternative modes of movement and creating opportunities for bringing wildlife into the area.
  - d) A continuous network of pedestrian and vehicular route ways that connects into and integrates with the existing, surrounding movement networks. There is a legible street hierarchy, where streets are designed as 'linear places' rather than movement corridors.
  - e) Good access to public transport and provision for a high level of amenity, information and safety for passengers.
  - f) Vehicle parking is an integral part of the plan for the scheme, to ensure limited impact on visual amenity and residential privacy. Any surface level parking makes provision for generous planting in order to aid visual containment and help to ameliorate the effects of climate change.
  - g) Measures to demonstrate how the amenities of existing residents living on the boundaries of this site will be respected and protected, with any proposed reserved matter layout justified on this basis.

- h) A proposed built form is proposed that supports the strategic objectives for the development of this site, and also demonstrates how a recognisable identity can be created.
- i) Regard has been had to noise and air quality considerations.
- j) The scheme proposes to provide new homes and buildings of a high quality, inspired by the character and existing architectural design of this part of Stafford. Regard has been had to the design policies set out in local planning policy and supplementary planning document (SPD).
- k) A phasing strategy which prioritises the provision of non-vehicular links, landscape planting and the provision of supporting services within the early years of the scheme has also been provided.
- l) Measures to conserve and enhance historic environment assets including St Thomas' Priory and landscapes such as Blackheath Covert;
- m) Protect nature conservation interests including Kingston Covert SBI;
- n) The development will maximise on-site renewable or low carbon energy production including associated infrastructure to facilitate site-wide renewable energy solutions.

## INFRASTRUCTURE

**The Master plan embraces the following elements.**

### Physical Infrastructure

1. Delivery of the Eastern Access Improvement Scheme and associated transport improvements from Weston Road to St Thomas' Lane;
2. Vehicular access into the Core Area from the Tixall Road and from the Eastern Access.
3. A strategy for pedestrian and cycling links within the development and between the site, the existing settlement and to Stafford town centre highlighting access points in convenient locations in relation to existing services and public transport facilities and the inclusion of improvements to transport capacity on Tixall Road and at the University roundabout on Weston Road.
4. The development of the buildings to include crime prevention measures and to maximise the opportunity to use sustainable construction methods.
5. Completion of links to the proposed 20 hectare employment land at Beacon Hill.

6. Necessary flood mitigation measures, the provision of sustainable drainage and a sustainable management strategy for the maintenance of these including off-site measures.
7. An access and transport strategy has been developed for the Strategic Development Location that maximizes accessibility by non-car transport modes to Stafford town centre through walking and cycling connections, nearby existing and new employment areas, identifies access points to the site and between the site and the existing settlement, identifies construction access arrangements that do not disrupt existing residents and improvements to transport capacity along the A518 Weston Road in the vicinity of the University roundabout and along the Tixall Road;

### **Social and Community Infrastructure**

1. The development provides a good mix of house types, sizes and tenures including an appropriate level of affordable housing and the variation in densities across the site.
2. The development provides accommodation that meets the needs of the elderly, dwellings that comply with the Lifetime Homes Standards through extra care and specialist housing.
3. Open spaces are provided within the new development at appropriate locations. They have been designed with adequate surveillance whilst having due regard to the amenity of neighbouring residents.

### **Green Infrastructure**

1. Protection and enhancement of nature conservation interests including the Kingston Covert SBI.
2. Retention of existing hedgerows and trees.
3. The development has been integrated into the landscape and accommodates sufficient natural green space through careful design and a landscaping strategy, which respects the existing habitat.
4. Accommodation of sufficient natural green space in accordance with Natural England's adopted standards. Natural green space can be delivered in phases provided each one meets the requirements for size, access, character, availability and function.
5. New landscaping and planting sited and selected to include sufficient large tree canopy cover across the site to deliver landscape-related climate change adaptation, urban cooling, shade and shelter, and visually enhance the development. Open spaces, streets and public areas will incorporate sufficient space above and below ground to enable large canopy trees to develop to maturity.

6. The proposal will include the sustainable management of open space.

### **Management and Community Engagement**

The Master plan for the site was exhibited at a public consultation event that was held at the Beaconside Recreation Centre on Weston Road on Wednesday 13<sup>th</sup> February, 2013. A copy of the exhibition is attached at Appendix A



Stafford East (Strategic Development Location- SDL): infrastructure requirement	Phasing	Cost	Possible funding sources	Responsibility for delivery and maintenance
<b>Greenspace</b>				
Greenways for cyclists and pedestrians internal in the development and connecting the site to the existing residential and commercial/employment areas near to the site with improved links to Stafford town centre.	2013 onwards during development	£50,000	Developer funded	Developer
Open Space – Creation of Local Areas including maintenance	2014 onwards during development	£200,000	Stafford Borough Council, Developer funded	Stafford Borough Council/ Developer/
Nature Conservation and Biodiversity	2014 onwards	£20,000	Developer contributions/and direct provision	Stafford Borough Council/Developer
<b>Physical</b>				
Road network access to and from the site	As development proceeds	TBC	Developer funded	Staffordshire County Council Developer
Delivery of the built environment on the site	2013 onwards	TBC	Developer	Developer
<b>Infrastructure</b>				
Electricity	2013	£941,000	Developer funded	Western Power Distribution
Gas	2013	£200,000	Developer contribution	

Water Supply		£50,000	Developer contribution	Severn Trent Water	
Surface Attenuation	Water	2013 onwards	£660,000	Developer funded	Developer
Sewage		2013 onwards	£300,000	Developer contribution	Severn Trent Water
Telecommunications		2013 onwards	TBC	Developer contribution	BT Openreach
<b>Transport</b>					
Mitigating impact on the existing highway network (i.e., Eastern Access Improvements Scheme; improvements to Tixall Road and, Weston Road roundabout if required and sustainable transport measures)		As the development progresses	£3.6m	Developer Funded	Developer/ Staffordshire County Council
Walking and cycling measures with improved links to Stafford town centre, proposed employment land at Beacon Hill and the existing built environment surrounding the site.		2013-2015	£4.2m	Sustainable Transport Fund	Staffordshire County Council
Public transport measures		As development proceeds	£300,00 over 5 years	Local Transport Plan, investment by public transport operators/ Developer Contributions	Staffordshire County Council

<b>Community</b>				
Extension to Stafford cemetery.	2014	N/A	Developer Contributing land	Developer/Stafford Borough Street scene
<b>Education</b>				
Provision to support new facilities at existing primary and secondary schools - St John's Primary and Weston Road Academy	As development proceeds	TBC	Developer Contributions	Staffordshire County Council
<b>Health</b>				
Assessment of Primary Care and GP provision.	TBC	TBC	Staffordshire PCT	Staffordshire PCT

**Table 1 Strategic Development Location at East Stafford Combined Site Infrastructure**

**PHASING**

<b>Year</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>
Approx. Housing Completions. Phasing to be agreed with Stafford Borough Council	50	50	75	75	75	50

**Table 2 Strategic Development Location at East Stafford Phasing Land North of Tixall Road**

**APPENDIX A**  
**PUBLIC EXHIBITION BOARDS**  
**INCLUDING SITE MASTER PLAN**

# WELCOME

Welcome to today's exhibition which introduces the potential for a residential development at Tixall Road to the east of Stafford. The site is recommended by Stafford Borough Council in its Plan for Stafford Borough 'Publication' as being a preferred option for the delivery of essential housing around the town.

The site provides an opportunity for a sustainable development. It is adjacent to the urban area of Stafford town with good accessibility to services and facilities by walking, cycling and public transport.

The site lies to the north and south of Tixall Road, bounded to the south by St Thomas' Lane and Blackheath Lane to the east, situated near to Staffordshire University, employment, services and transport links.

It is likely that the proposals will include in the region of 600 houses comprising a full mix of housing for local people from family homes to housing for the elderly, first time buyer and affordable homes.

A one acre extension to the crematorium is proposed in addition to accessible green space and public open space within the site. The developer would also make contributions to other infrastructure including education and highways to ensure that existing provision in the local area is improved by the proposed scheme.

The project team has now commenced work on a planning application for the scheme. This exhibition provides details of the technical reports carried out to date and the issues that have been highlighted so far.

We welcome your comments and ideas. Please view the exhibition, discuss with the team and complete a short questionnaire.



Commercial Estates Group and First City are keen to work with local people in order to deliver a scheme that is valued by the community.

## Commercial Estates Group (CEG)

CEG actively invests in, develops and manages property throughout the UK. The company works in partnership with investors, local authorities, existing communities and Urban Regeneration Companies to deliver complex regeneration schemes which are designed to meet local needs.

CEG specialises in the creation of inspirational new places incorporating sustainable new homes, business space and neighbourhood facilities and has been named exemplar in terms of involving the local community in creating masterplans.

CEG is delivering high quality residential schemes in Chester, Leeds and other areas.

## First City The Property Consultancy (First City)

First City is coordinating the Stafford East project on behalf of the landowners and working with a dedicated project team of support consultants to bring a unique mix of skills and experience to this project.

The team includes members of the Royal Institution of Chartered Surveyors and the Royal Town Planning Institute with the imagination and foresight to deliver unique solutions and quality developments..

COMMERCIAL ESTATES GROUP



Examples of homes at CEG's Chester development

# THE NEED FOR NEW HOMES

Nationally, there is a need to build three million new homes in order to tackle the country's long-term, under supply of housing. The UK's population is growing, we are living longer and more of us are living alone or in smaller households. The lack of new homes being built, coupled with the challenge of accessing mortgages is making the UK's housing crisis worse. This must change if we are to house the next generation.

## Why Are New Homes Needed in Stafford?

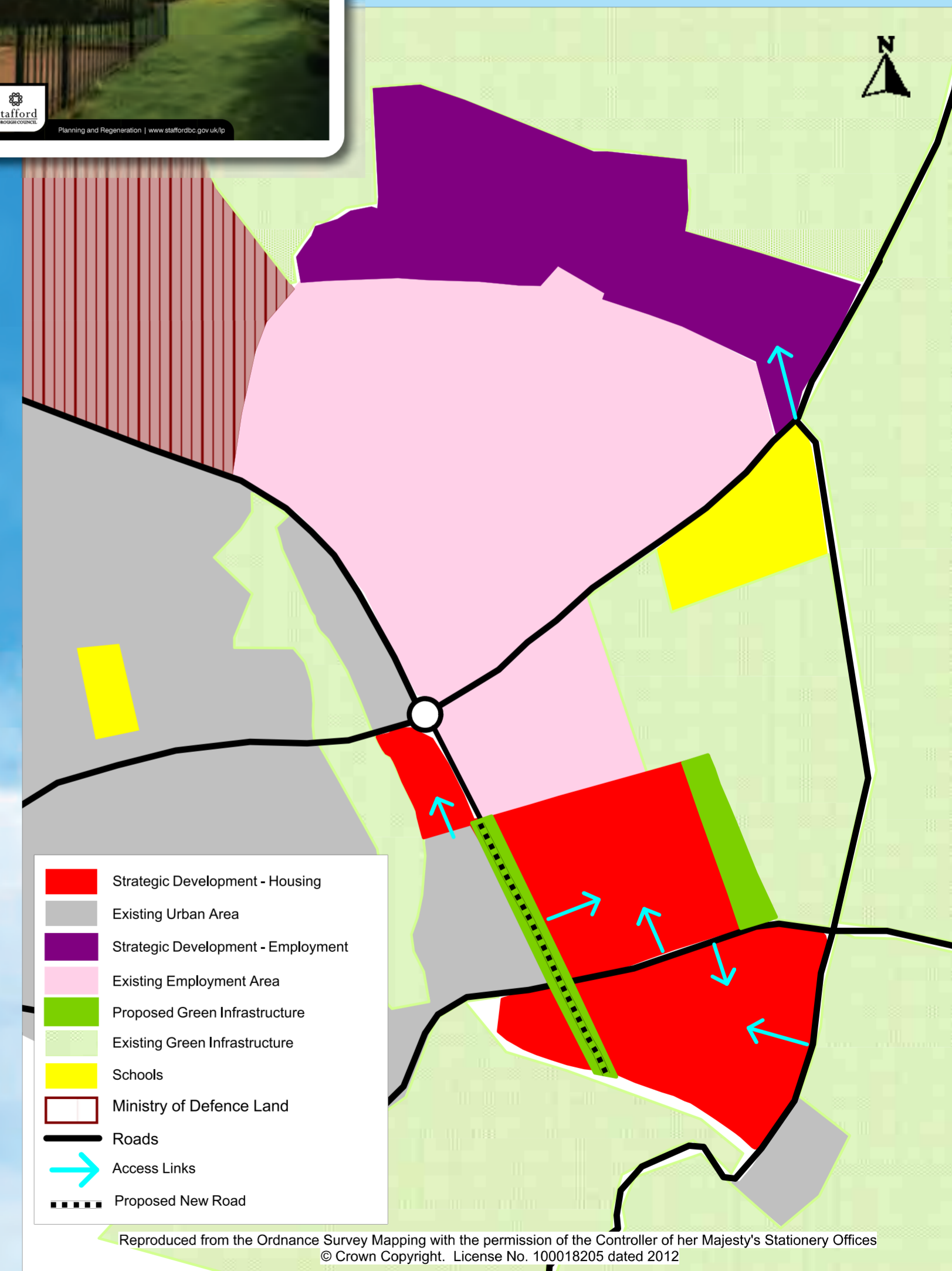
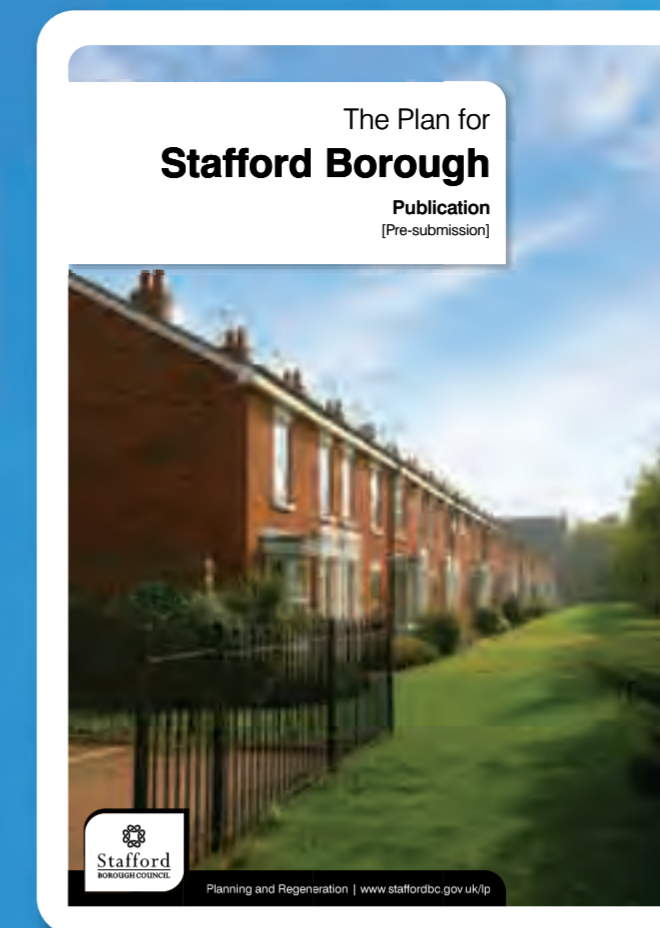
Stafford is located on the national road and rail network and has the highest level of services in the Borough. The latest 2010 population projections show an increase of 19,900 residents from 126,100 to 146,000 people in 2035. This is an average of 500 new houses needed per year.

The Plan for Stafford Borough is currently out for consultation. This outlines the sites proposed for new housing and employment development. It identifies the need for Stafford to provide a minimum of 10,000 new homes between 2011 and 2031 with more than 7,200 of these on the edge of Stafford Town. The Plan identifies this site for a strategic housing development as part of an eastern extension area. Further information about the Council's Local Plan can be found at [www.staffordbc.gov.uk/publication](http://www.staffordbc.gov.uk/publication)

## Delivering Community Benefits

The Government has introduced a New Homes Bonus. This is Government funding given to communities like Stafford, to provide for the new facilities and services required in line with housing growth.

The New Homes Bonus from the Government for this scheme is expected to be in excess of £5 million, in addition to contributions to schools, transport and community infrastructure through developer-funding as part of a legal agreement with the planning authority. The new residents will also help to support and sustain local shops, business and services injecting some estimated £7.5m into the economy each year.



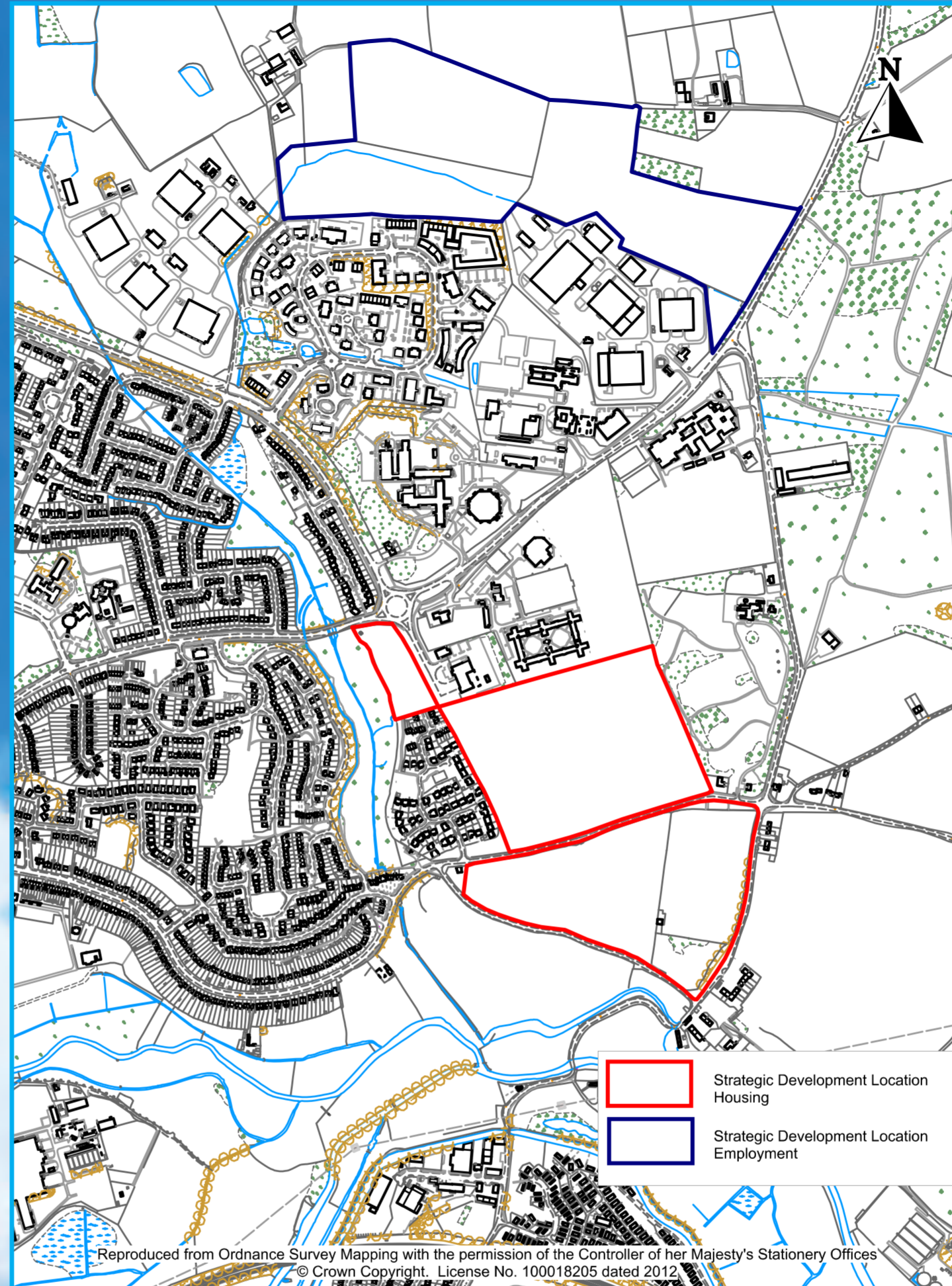
# THE SITE

The Stafford East site is relatively low quality agricultural land. The site lies to the north and south of Tixall Road, bounded by St Thomas' Lane to the south west and Blackheath Lane to the south east, with planting along all boundaries which obscures views of the site.

The site has a mixed topography and decreases in height from the Beaconside / Tixall Road area (North) towards St Thomas' Lane (South).

The site adjoins existing housing north of Tixall Road, together with Staffordshire University and Stafford Crematorium. To the south east lies the St Thomas' Priory, a Scheduled Ancient Monument, comprising a group of Listed Buildings which have been converted to residential dwellings. To the south is the River Sow valley and to the west lies existing residential development.

It is proposed to develop the site for residential-led development of circa 600 dwellings, in a sensitive manner, to ensure new housing is linked with the existing urban area and the development sits well in the wider environment.



Stafford Borough Council's Plan





# ENVIRONMENT

Assessments have been undertaken into ecology, archaeology, flooding, landscape, infrastructure and drainage to ensure there are no physical constraints and that the site can accommodate the development. Measures to reduce or eliminate any effects of development are also identified.

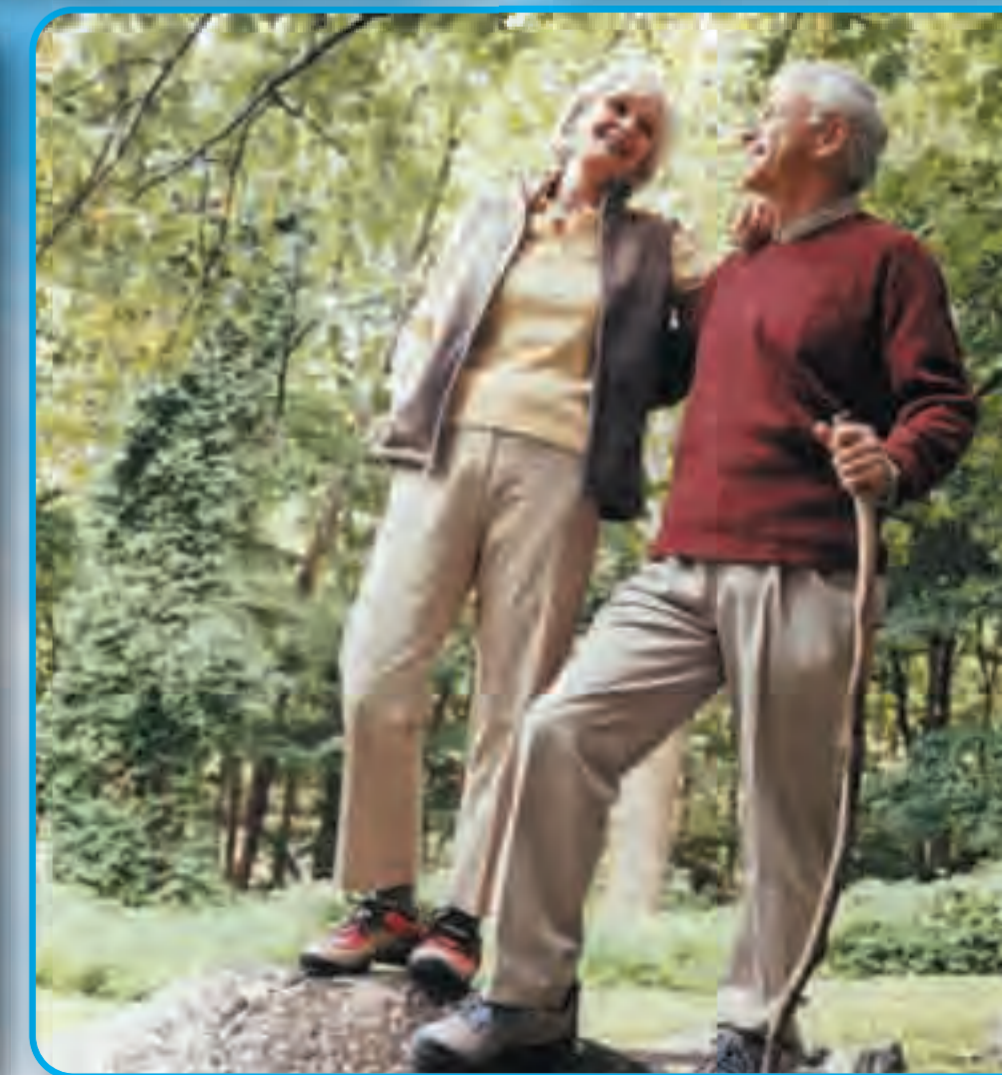
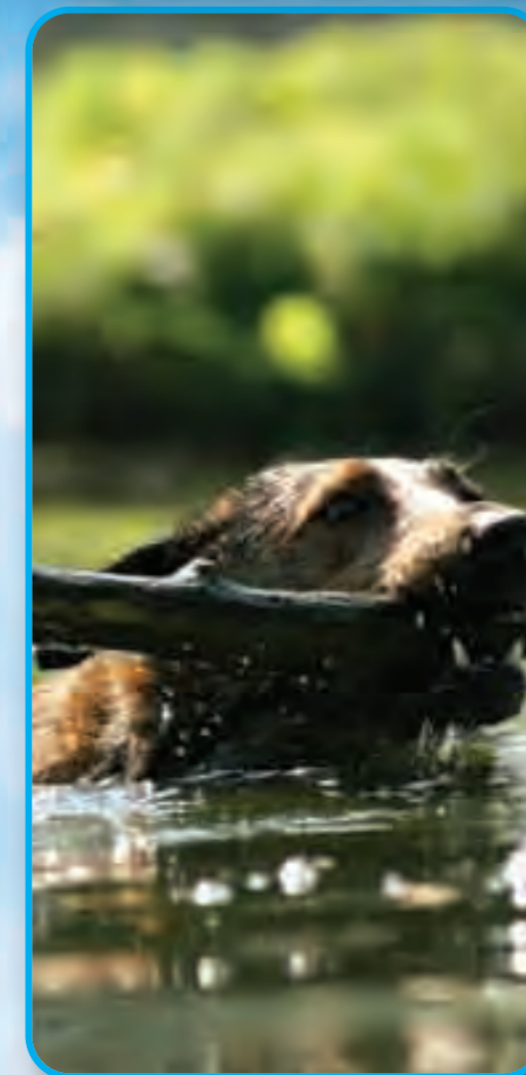
**Landscape** - The site is bounded by planting which obscures views of the site. Important landscape features will be retained and new landscaping contributes to the character.

**Drainage** - There are no known localised flooding issues from highways, public sewers and groundwater. Sustainable Urban Drainage Systems (SUDS) and storm water attenuation measures will form part of the proposal to effectively manage surface water runoff.

**Ecology and Environment** - There are mature trees and hedgerows within and around the site which are used as green corridors by a variety of species, including nesting birds and bats. Through well planned development we will protect key habitats and species and minimise any adverse effects by strengthening wildlife corridors, providing additional foraging and sheltering opportunities, and introducing ecologically based landscaping including the planting of native shrubs and trees and new ponds.

**Archaeology/Built Heritage** - There are no Scheduled Ancient Monuments, Historic Parks and Gardens, or Registered Battlefields on the site itself. Beyond the site is a Scheduled Monument of St Thomas' Priory. This will be taken into account and its setting protected in terms of distances, screening and landscaping.

**Services and Facilities** - The scheme will seek to complement rather than compete with surrounding services. Appropriate contributions will be made to enhance local schools, which will be determined by the education authority. Contributions will be made for highways improvements and the site will be as sustainable as possible maximising opportunities for green travel.



# TRANSPORT AND ACCESS



Traffic surveys have been undertaken to understand traffic flows and existing constraints, and to identify the mitigation measures needed to ensure the proposed development can be accommodated on the highway network. Discussions are on-going with the County Council as Local Highway Authority.

## Sustainable Travel

The site is around 2km east of Stafford Town Centre and therefore within easy reach of facilities. Sustainable travel initiatives will be a priority to ensure the development is as sustainable as possible, and this will include investment into improving access to and from the site by foot, cycle and public transport. The aim will be to make these modes of travel as convenient and easy as possible to increase non-vehicular travel from day one, minimising the number of car trips.

Staffordshire County Council is investing more than £4.2 million on sustainable transport initiatives, including the Baswich Walking and Cycling Route, to deliver an impressive new link across the River Sow Valley to provide an attractive safe environment for those walking and cycling to employment, education, training, leisure and health services in the eastern quadrant of Stafford. In addition the Council will be providing a new mobile Cycle Centre and Bike Loan Scheme providing training and safety advice, together with the sale and loan of new and reconditioned bikes.

Our scheme will complement these new facilities with shared cycle/footways linking to the Baswich walking and cycling facility between Baswich Lane and Weston Road.

## New, Improved Bus Service

Our proposals will also enhance the bus services from the site and we are talking to the Council about investing in an improved local service so a bus runs every half an hour into Stafford town centre.

## Road Improvements

The delivery of phase one of the Beaconside Extension and associated transport improvements on Weston Road and St Thomas' Lane is a key component of this scheme. Construction of the link road will provide easy access to Beaconside and the continuation of a high quality route to the east and north of Stafford to the M6 at junction 14, providing traffic relief to Blackheath Lane, including its junctions with Tixall Road and Weston Road and some relief to the Weston Road/Tixall Road junction.

The Weston Road/Blackheath Lane priority T-junction is to be converted into a four arm roundabout as part of the Beaconside Industrial Estate development proposals, significantly improving the operation of this junction and assisting movements from and to Blackheath Lane.

An access, transport and travel plan strategy will be submitted and this will look at transport improvements on Baswich Lane, the Baswich Walking and Cycling Route, the A518 Weston Road roundabout junction with Beaconside and enhanced bus services between the site and the town centre.

Access from the site will be dispersed across the road network with initial access points onto Tixall Road and Blackheath Lane, with a further access onto Weston Road as development progresses.

The package of measures proposed would ensure that the scheme delivers improvements to local roads and that additional vehicles resulting from the development's future residents can be accommodated safely on the highway network.

# INDICATIVE MASTERPLAN



New parks,  
green space



Crematorium  
extension



New landscaping

In the region of 600 new family homes, including accommodation for the elderly, first time buyers and affordable homes for local people.



# NEXT STEPS

## Thank you for attending the exhibition.

All of the feedback provided via the questionnaires completed at today's event will be fed back to the project team. In addition, many reports/surveys are underway by environment and transport experts to assess the potential impacts of development of the site. This information, as well as discussions with the relevant authorities, will be used to inform proposals and the preparation of further details for the site.

The intention is to obtain as much local feedback as possible via this public exhibition and feedback from leaflets so that the needs and aspirations of the local community can be properly considered during the development of the masterplan and planning submission.

We would be grateful if you could complete a short questionnaire at today's event and leave your contact details so we can keep you informed.

Further information is available  
by calling 08448 425 285  
or emailing  
[staffordeast@beattiegroupp.com](mailto:staffordeast@beattiegroupp.com)



## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Stafford Borough Council (Councillor A J Perkins)
Comment ID	PS514
Response Date	27/02/13 14:00
Consultation Point	The Plan for Stafford Borough - Publication ( <a href="#">View</a> )
Status	Processed
Submission Type	Letter
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough 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?** No, I do not wish to participate at the examination in public

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	First City Limited (Mr Graham Fergus)
<b>Comment ID</b>	PS515
<b>Response Date</b>	27/02/13 15:13
<b>Consultation Point</b>	36 Policy N6 ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Amended Section 20(7B) of the 2004 Act establishes that the duty to co-operate imposed by amended section 33A is incapable of modification at Examination. Therefore it will be one of the first things that the Examination Inspector looks at because if the legal requirement is not fulfilled then the only option is for the Plan to be found unsound. The Duty requires the council to show that it has engaged constructively, actively and on an ongoing basis in the preparation of the Plan on all matters concerning development which would have a significant impact on at least two planning areas. We are not convinced this has been done in relation to the wording of Policy N6. We have considered the wording for the equivalent Plans for Cannock Chase and Lichfield. The wording of your council's policy is inconsistent with both. This policy goes to the heart of development viability and could result in delays or affect development viability.

**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 council should start by contacting the neighbouring councils and Natural England to agree a consistent policy wording. The council might start by adopting the wording in Policy CP13 of the Cannock Chase Plan to reflect the fact that work on this issue is ongoing and mitigation can take a number of different forms in practice. Flexibility has to be the key component.

*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

**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**

Our representation is fundamental to the delivery of this part of the spatial strategy and in turn the soundness of the Plan. Our participation at the examination is vital for the issue to be considered fully.

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	Sainsburys Supermarkets Ltd ( )
Comment ID	PS516
Response Date	28/02/13 11:07
Consultation Point	32 Policy N2 ( <a href="#">View</a> )
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 Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Policy N2 of the Publication document sets out a requirement for non-residential development up to 1,000 sq m to achieve BREEAM Very Good, and for non-residential development over 1,000 sq m to achieve BREEAM Excellent unless it can be demonstrated as technically unfeasible. Paragraph 158 of the NPPF clearly states that "each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence" and strategies should "take full account of relevant market and economic signals." It is unclear as to how the requirement to meet BREEAM standards set out in Policy N2 has been derived from the supporting evidence base studies.

We are particularly concerned that the requirements to meet BREEAM standards have not been adequately viability tested through the supporting evidence base work. Paragraph 173 of the NPPF states that "sites should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened."

Whilst we recognise that the policy provides flexibility in applying the standards if it can be demonstrated that it is financially unviable, we do not consider the requirements to meet BREEAM standards are an appropriate starting point without being viability tested through supporting evidence base work.

On this basis we object to Policy N2 and consider that it does not meet the test of soundness requiring the plan to be justified and consistent with national policy. We therefore suggest the following changes to ensure that the policy is clear and consistent with national policy:

*All non-residential development up to 1,000 square metres (net) will be expected should aim to have a BREEAM Very Good rating; and non-residential development greater than 1,000 square metres (net) will be expected should aim to have a BREEAM Excellent rating.*



## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Mr R G Jones
Comment ID	PS517
Response Date	27/02/13 14:26
Consultation Point	12 POLICY STONE 1 ? STONE TOWN ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.9

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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The Stafford Borough Council document "Strategic Flood Risk Assessment for Local Development Framework Vol 1 Jan 2008 does not include in its appendices a map of central Stone showing flood risk. On two occasions I have visited Stafford Borough Hall and enquired whether I could view flood maps for Stone. On both occasions I was told to contact the Environment Agency (despite the fact that this is a Borough document) and on the last occasion (February 25 th 2013 ) I was informed that I could not see the map as it was copyright. I feel that this has restricted my participation and I do not know fully the facts that allow a proposal to develop this site. Stafford and Stone Retail Capacity Study January 2011 recognises that the site is on flood zone 3 and gives it the lowest score of 0 (max 10). Figure 1 (personal photograph) shows a recent flood (July 2012) event 500 metres south of Westbridge Park . Flooding is commonplace as befits a flood plain. Access to the Environment Agency show clearly

that areas of this site are in flood zone 3a(dark blue) and some flood zone 2(light blue) (terms used in Strategic Flood Risk Assessment for Local Development Framework Vol 1 Jan 2008 see Fig 2) . An historical Environment Agency map of October 2004 (figure 3) extends possible flooding to include the A520. More detail is provided by the Environment Agency which assesses the flood risk at map reference SJ 90229 333524 (this would be the A520 access road to the supermarket) to be significant. The chance of flooding each year is greater than 1.3% (1 in 75). Flooding has occurred on a number of occasions in living memory. I attach two personal photographs dating from a flash flood event that occurred in August 1987. Figure 5 shows flooding in towards the area of Westbridge Park. The flooded area indicates where the proposed supermarket site entrance would be located. Figure 6 shows a view near the entrance of the proposed supermarket looking towards the town centre. Today there is still concern for flooding and figure 4 indicates a current map from the Environment Agency website which shows how this area already receives flood alerts. This is the site of the proposed supermarket and its approach roads. The catchment area for Stone is 230km<sup>2</sup> (SFRA 2008) which would indicate that a storm event of 30 mms would generate a potential 6,900 cubic metres to flow through Stone. This approximates to the volume of 2.76 Olympic size swimming pools on top of the existing river flow. Recently the Met Office News Blog recorded 31.6mms of rainfall in nearby Leek, Staffordshire from Saturday 24 th November 2012 until 8 am Sunday 25 th November. ( Seathwaite in Cumbria received 314mm of rainfall in 24 hours November 19 th 2009) The frequency of extreme rainfall in the UK may be increasing, according to analysis by the Met Office. 3 January 2013 "There's evidence to say we are getting slightly more rain in total, but more importantly it may be falling in more intense bursts" Professor Julia Slingo (Met Office) <http://www.bbc.co.uk/news/uk-20896049> Normally infiltration would create a time lag . However short downpours tend to reduce infiltration capacity and the threat of pluvial flooding increases. There are 2 factors to consider: Increased urbanisation in the Stone area (including the impact of development of Westbridge Park on downstream settlements such as Little Stoke and Aston, including the marina site which is adjacent to the river Trent.) Climate change: SFRA 2008 5.2 already recognises that peak rainfall intensity will increase by 5% from 1995-2025 and that peak river flow will increase by 10% 1990-2025 to 20% 2025-2055. An increase in peak river flow will inevitably increase flood risk. The nearest upstream gauging station for Stone is at Darlaston (1 km north) and has a bankfull level of 1.49 metres. The river reached 2.80 metres on 6 September 2009. Increased runoff has implications for both fluvial and pluvial flood events. As choices made in the plan should be backed up by facts I will refer to recent flood events at Darlaston reported by the BBC 23 November 2012 Drivers rescued from flood water in Stone Firefighters have rescued three people who were trapped in their cars in flood water in Staffordshire. Staffordshire Fire and Rescue service said it attended three separate incidents on Friday at the junction of the A34 and Meaford Road in Stone <http://www.bbc.co.uk/news/uk-england-stoke-staffordshire-20458881> 15 December 2012 Trapped driver rescued from Stone flood water. A woman was rescued after her car became trapped in flood water up to its windows, the fire service has said. Staffordshire Fire Service said it had to carry out three rescues overnight on the A34 in Stone. <http://www.bbc.co.uk/news/uk-england-stoke-staffordshire-20739235> In my reference to Environment Agency flood maps I have pointed out that the A520 is prone to flooding and some of the site is at flood risk. Note the EA does not take into account the effects of climate change or winter rainfall (SFRA Appendix C) . The "Development and Flood Risk section of the WMRSS states in 8.42 that "the implications of climate change for the severity of floods is uncertain but the most realistic approach is to accept that flooding is a realistic process" The area for development is next to a canal and this must be factored in when considering the flood risk. FRALDF 2008 4.4.2 recognises that PPS 25 does not require flood risk from canals and reservoirs in the flood map. "This is surprising as overflows from canals are common...Occasionally major bank breaks occur leading to rapid and deep flooding of adjacent land." See Figure 7. Justification for changing Westbridge park into mixed development. Should be queried. There is insufficient available material to warrant building on the flood plain. It is less effective since there are conflicting national guidelines to such developments. I deem the proposal to be unsound after identifying facts including those from the Environment Agency, and Stafford Borough Council My concerns are:

- . Safety of shoppers who may be trapped in a flood prone building or on access roads
- . Any costs of flood mitigation. Who would fund? Who would accept responsibility if proven that a new development could cause increased flooding downstream at Little Stoke or Aston?
- . Whether sequential tests have been properly applied.
- . Environmental concerns. Increased runoff would inevitably alter fragile habits in an area which has been designated a "green corridor" ( Policy N2 Sustainable Drainage " Protect and enhance

wildlife habitats, existing open spaces / playing fields, heritage assets, amenity and landscape value of the site ...)

In summary, Westbridge Park should not be transformed into an area of mixed development and should retain its green status (in line with its role in the Green Infrastructure GI). Further development of buildings on an area prone to flooding should be avoided.

*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

**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**

I am a long time resident of Stone representing a number of citizens who share my views.



Figure 1 (above), Figure 3 (below)

Figure 2 (above), Figure 4 (below)





Figure 5



Figure 6

Figure 7

Canal flooding central Stone. August 1987  
20 metres from proposed supermarket development  
(personal photograph)



## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	Sainsburys Supermarkets Ltd ( )
<b>Comment ID</b>	PS518
<b>Response Date</b>	28/02/13 11:07
<b>Consultation Point</b>	21 Policy E8 ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	0.3

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Policy E8 of the Publication document seeks to support the function of the town, local and other centres within the Borough, and sets out a hierarchy of centres line with the sustainable settlement hierarchy set out in SP3.

Whilst we support the policy to encourage retail development in existing centres, it should be clear within Policy E8 that any retail developments outside of the identified centres will be assessed in accordance with the sequential approach as well as a consideration of impact on other centres in the catchment area. This approach accords with national policy.

As currently drafted in the Publication document, Policy E8 states the following:

"If planning permission is granted for retail development in an edge-of-centre or out-of-centre location, the range sold at the development may be restricted either through planning conditions or legal agreement. No new development for retail warehouses and superstores is required in these locations at Stafford"

As worded, this part of the policy sets out a starting point to 'resist' retail warehouses and superstores in edge-of-centre and out-of-centre location, which runs contrary to the positive approach as set out in the NPPF, and Policy SP1 of the Publication document.

Paragraph 19 of the NPPF states that "planning should operate to encourage and not act as an impediment to sustainable growth", while paragraph 23 states that "planning policies should be positive".

Policy E8 should therefore be worded to reflect a positive approach to determining applications for main town centre uses outside of existing centres, providing that they are in accordance with the sequential approach and consideration of impact.

On this basis, we object to Policy E8 and consider that it does not meet the test of soundness requiring the plan to be consistent with national policy. We therefore suggest the paragraph identified above is removed from Policy E8.

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

Comment by	Stafford Borough Council (Councillor A H Stafford Northcote)
Comment ID	PS519
Response Date	27/02/13 14:00
Consultation Point	The Plan for Stafford Borough - Publication ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** Yes

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough 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?** No, I do not wish to participate at the examination in public



## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	Mr Richard Brown
<b>Comment ID</b>	PS520
<b>Response Date</b>	28/02/13 11:46
<b>Consultation Point</b>	The Plan for Stafford Borough - Publication ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	0.3

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

# Richard Brown MSc

18 Redwood, Burnham, Buckinghamshire, SL1 8JN  
Tel: 01628 663638 Fax: 01628 667587 Mob: 07979 852852  
Email: richard.brown.rb@btconnect.com

*Our ref: RB/WLW/Exeter Street  
Stafford  
Your ref: Forward Planning*

Stafford Borough Council  
Civic Centre  
Riverside  
Stafford  
ST16 3AQ

28<sup>th</sup> February 2013

**By E-Mail and Post**

Dear Sirs

**LAND ADJACENT TO EXETER STREET STAFFORD  
(AS SHOWN ON THE SITE PLAN ATTACHED AND EDGED RED)**

We act for Robert Leckie Properties, and are making these submissions with regard to the emerging Local Plan.

The site is crescent shaped and extends to approximately 1.9 hectares.

The site comprises unused grazing farmland.

The site adjoins the existing urban area.

Stafford was originally identified in the RSS as a “large settlement”.

The site lies immediately outside the existing residential development boundary and is designated as part of the Borough’s “Green Network” which comprises areas of undeveloped land that link the open countryside with the town centre.

The site is also adjacent, at its south end, to an area of Protected Open Space.

Due to the fact that the site is located outside the existing Residential Development Boundary and within the Green Network the development of the site for residential purposes would be contrary to existing Local Plan policies HOU3 and E and D27.

Cont...2

It is submitted that given the land supply requirements for the Borough, that for the emerging Plan to be considered “sound”, the Borough Council will need to identify additional land, and that the Council should consider greenfield sites for development.

The site would appear to be in a sustainable location and is free of any obvious physical constraints.

The site appears suitable for residential development in principle.

It is considered, that in the light of the pressure to achieve the proposed housing targets, and to consider paragraph 47 of the National Planning Policy Framework (to boost significantly the supply of housing) that the emerging Local Plan should, therefore, seek to allocate smaller, deliverable sites such as Exeter Street, because adequate infrastructure is already in place.

It is considered that the infrastructure in the area is sufficient to accommodate new housing development on the site, given its location on the edge of an existing residential area.

The National Planning Policy Framework requires Local Planning Authorities to submit a sound development plan for examination.

A sound development plan is:

- positively prepared
- justified
- effective
- consistent with national policy

This site is considered compliant with the sentiments expressed in paragraph 14 of the National Planning Policy Framework.

It is submitted, therefore, that the site should be allocated for residential development in the emerging Local Plan.

It is also submitted that paragraph 52 of the National Planning Policy Framework which confirms that the supply of new homes can sometimes be best achieved through “extensions to existing villages and towns”.

The National Planning Policy Framework confirms that with regard to special protection for any green areas, that these should be identified for special protection if these areas are of “particular importance” to the local community.

It is submitted that the emerging Local Plan should seek to strike a balance between the proposed Green Network policies of constraint and addressing the land supply requirements which, it is submitted, would need to include releasing greenfield sites such as Exeter Street, where the sites abut the existing residential area.

It is submitted that the emerging Local Plan would not be considered sound without the release of such greenfield sites adjoining the urban area.

Yours faithfully

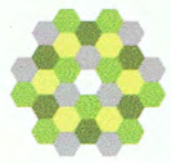
A handwritten signature in blue ink, appearing to be 'Richard Brown', written in a cursive style.

**Richard Brown MSc**

Enc Site Plan

Land Registry  
Official copy of  
title plan

Title number **SF471722**  
Ordnance Survey map reference **SJ9221NE**  
Scale **1:2500**  
Administrative area **STAFFORD**



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## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	The Garden Centre Group ( )
<b>Comment ID</b>	PS521
<b>Response Date</b>	27/02/13 15:16
<b>Consultation Point</b>	The Plan for Stafford Borough - Publication ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	0.5

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

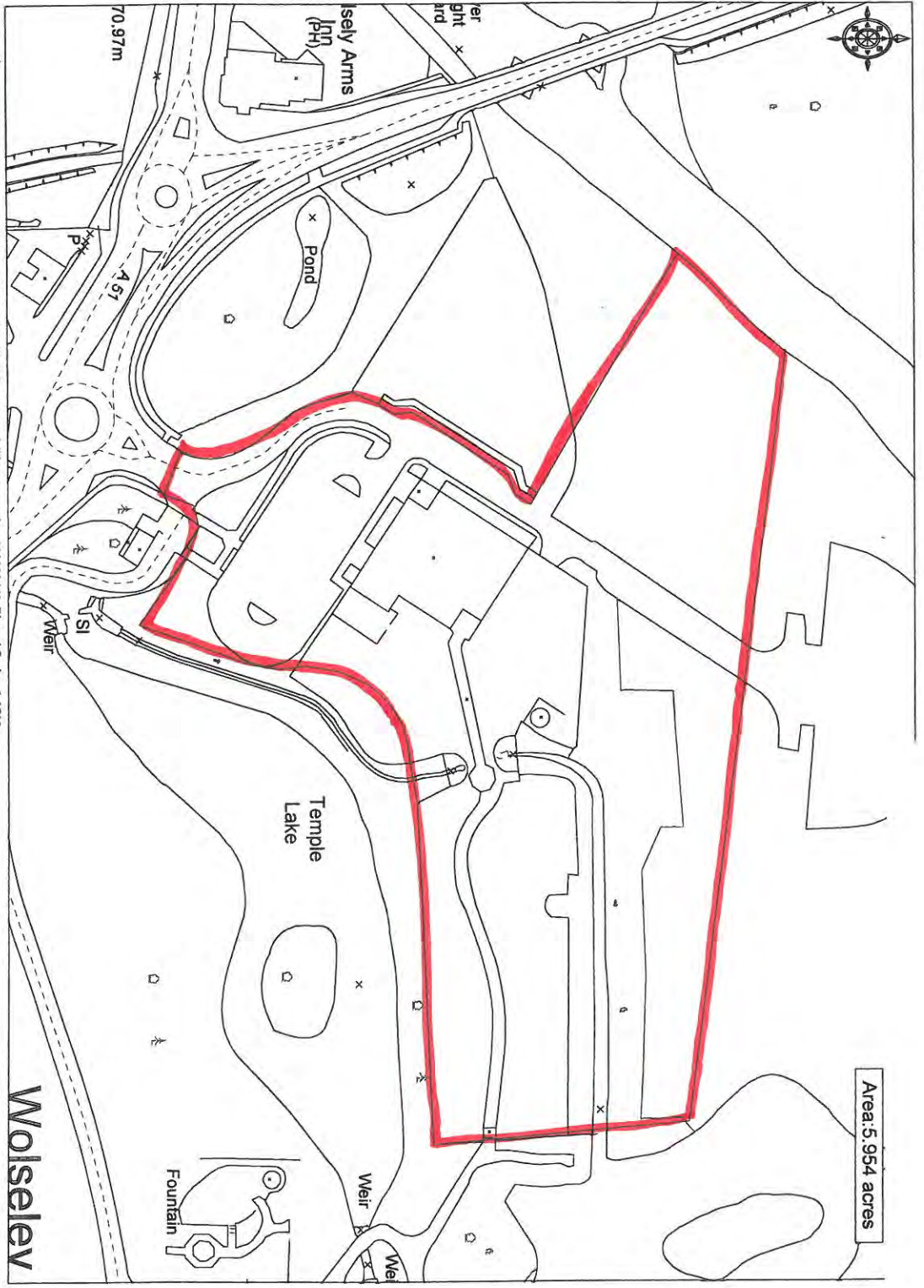
Gregory Gray Associates is instructed by The Garden Centre Group to submit representations regarding the above document, which is currently on consultation. These comments consider the policies and proposals contained in The Plan for Stafford Borough (Pre-Submission Publication) and also add further comments regarding our client's site and the soundness of the document in relation to the Government's National Planning Policy Framework (NPPF). **Site Description** The site is located at Wolseley Bridge Garden Centre, Wolseley Bridge, Stafford, ST17 0YA. The site is approximately 3 hectares and is located on the A51, north-west of Rugeley. There is an existing access, off the A51. The site includes an Historic Environment Record allocation in the Stafford Borough Local Plan (2001), which relates to Wolseley Hall Park. The site is considered as brownfield land and contains a number of buildings and areas of hard-standing. Buildings predominantly comprise of timber framed construction, with pitched slate roof. A site location plan is enclosed and this demonstrates the extent of development on site. The National Planning Policy Framework (NPPF) came into effect on 27 March 2012 and sets out the Government's new planning policies and how these are to be applied. The key aim of the NPPF is to ensure the delivery of sustainable development. The NPPF provides guidance to Local Planning Authorities (LPAs) whilst preparing their Local Plans. Set out below is a key summary of the policies relating to this:

- . Sustainable development - the NPPF makes a clear direction to support sustainable development; Paragraph 15 states that policies in Locals Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay.
- . For the Local Plan to pass the test of soundness at Examination in Public (EiP), Paragraph 182 of the NPPF advises that the following criterion should be applied:-
- . The plan should be positively prepared to meet objectively assessed development and infrastructure requirements, with the presumption in favour of sustainable development;
- . The plan should be justified to provide the most appropriate strategy;

- . It should be effective so far as to be deliverable over its period; and
- . The plan should be consistent with National Policy.
- . Paragraph 178 states that public bodies have a duty to co-operate on planning issues across administrative boundaries, particularly those that relate to strategic policies, which are set out in Paragraph 156 of the NPPF. Such strategic policies referred to include the homes and jobs needed within the area.
- . Local Plans should plan positively for development and allocate sites to promote development and flexible use of land (Paragraph 153).
- . Paragraph 21 specifies that planning policies should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing. Local Planning Authorities should set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth.
- . Within the Core Planning Principles set out Paragraph 17, the NPPF advises that planning should proactively drive and support sustainable economic development to deliver the homes, business and industrial units that the country needs. Every effort should be made to respond positively for growth.
- . Paragraph 17 also encourages the effective use of land by using previously developed (brownfield) land.
- . Paragraph 22 states that planning policies should avoid the long term protection of sites allocated for employment where there is no reasonable prospect of the site being used for that purpose. When this occurs, applications for alternative uses should be treated with regard to market signals and sustainability.

In relation to the historic environment, Paragraph 126 states that Local Planning Authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment. In developing this strategy, Local Planning Authorities should take into account the desirability of new development making a positive contribution to local character and distinctiveness. In summary, the NPPF makes a clear direction to support sustainable development and significantly increase the supply of housing. Strategic policies and site allocations should be based on a robust evidence base, and development should be directed to sustainable, brownfield sites. In summary, we generally support the approach taken to The Plan for Stafford Borough. The Plan's Vision should ensure the sustainable growth of the district, though we advise that further reference to employment and investment growth is required to ensure the deliverability of the Plan. We consider that SP1 and SP3 provide a positive framework to promote the sustainable growth of the Borough. We do, however, suggest that the Settlement Hierarchy, as set out in SP3, should favour limited development outside of the Towns and Key Service Villages where located on brownfield, vacant sites. Our client's site is located at Wolseley Bridge Garden Centre, and could become available within the Plan period. The site has a significant development footprint and therefore is not considered to contribute to the setting or conservation of the locality. The future development of the site for mixed-use could enhance the surrounding area through reducing the site's development footprint, as well as meeting local development needs. In terms of sustaining and diversifying the local economy, in line with Policy E1, the Council should recognise that mixed use allocations comprising of tourism, employment, care and leisure can make a substantial contribution to job creation.

**Wyevalle Property Review**  
**Rugeley**



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*For indicative purposes only*  
*Not to Scale*  
*June 2005*



## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	The Garden Centre Group ( )
<b>Comment ID</b>	PS522
<b>Response Date</b>	27/02/13 15:16
<b>Consultation Point</b>	5 Spatial Vision and Key Objectives ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	0.3

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

We are in general agreement with the Spatial Vision for Stafford. The Vision should seek to enable the Borough to sustainably grow and thrive throughout the Plan period.

We agree with the principles of sustaining rural areas through the provision of facilities and services in such areas. This will allow the growth of the district with some flexibility to ensure development is not only focussed in the main towns.

We do, however, advise that the vision for Stafford Borough should place additional focus on the generation of investment and employment, in line with the NPPF. We suggest that reference is made to the sufficient provision of employment to meet need and boost the economic growth of the Borough. It should be recognised that non-traditional employment, such as tourism and leisure, can generate significant growth and investment.

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	The Garden Centre Group ( )
<b>Comment ID</b>	PS523
<b>Response Date</b>	27/02/13 15:16
<b>Consultation Point</b>	5 Spatial Vision and Key Objectives ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	0.3

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

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### **Key Objectives - Areas outside of Stafford and Stone**

The Key Objectives for the areas outside of Stafford and Stone generally accord with the NPPF in terms of meeting the development needs of the smaller villages and rural areas.

We recommend that the objectives include reference to the re-use of land; there should be a clear preference for brownfield sites. It should also be recognised that the redevelopment of vacant, brownfield sites can enhance the existing landscape through sensitive new design. For example, it may be possible to reduce the overall footprint and visual impact of the development.

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	The Garden Centre Group ( )
<b>Comment ID</b>	PS524
<b>Response Date</b>	27/02/13 15:26
<b>Consultation Point</b>	1 SPATIAL PRINCIPLE 1 (SP1) - PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	0.3

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

We consider that SP1 creates a positive framework to ensure that the development needs of the district can be met sustainably and efficiently, and this is in accordance with the NPPF. By working with applicants to find resolutions to planning constraints, the Council should ensure the deliverability of the Plan.

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	The Garden Centre Group ( )
<b>Comment ID</b>	PS525
<b>Response Date</b>	27/02/13 15:16
<b>Consultation Point</b>	2 SPATIAL PRINCIPLE 2 (SP2) ? STAFFORD BOROUGH HOUSING & EMPLOYMENT REQUIREMENTS ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	0.3

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

We generally support the housing and employment land provision set out in SP2. We recommend that this provision should be directed to sustainable locations in proximity to major road networks. In accordance with the sustainable aims of the NPPF, vacant brownfield sites should be favoured. Again, we consider the preference for brownfield sites should be stressed.

We also suggest that the employment land provision does not solely relate to traditional B1, B2 and B8 uses. It should be recognised that non-traditional employment uses, such as leisure, tourism, care and retail can also generate a significant number of jobs.

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	The Garden Centre Group ( )
<b>Comment ID</b>	PS526
<b>Response Date</b>	27/02/13 15:16
<b>Consultation Point</b>	3 SPATIAL PRINCIPLE 3 (SP3) ? STAFFORD BOROUGH SUSTAINABLE SETTLEMENT HIERARCHY ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	0.3

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

We generally support the Sustainable Settlement Hierarchy as set out in SP3. Development should be primarily focussed in the Towns and Key Service Villages to offer the most sustainable approach. We do, however, suggest that SP3 should be amended to allow limited development outside of the Towns and Key Service Villages, where located in sustainable locations. Vacant brownfield sites in such locations should be viewed favourably, as the redevelopment of such sites can offer a sustainable solution to meeting local development needs.

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	The Garden Centre Group ( )
<b>Comment ID</b>	PS527
<b>Response Date</b>	27/02/13 15:16
<b>Consultation Point</b>	5 SPATIAL PRINCIPLE 5 (SP5) ? STAFFORD BOROUGH EMPLOYMENT GROWTH DISTRIBUTION ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	0.3

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

We consider that the Employment Growth Distribution outlined in SP5 should encourage and enable growth across the Borough. Although growth is focussed in Stafford, the high provision of employment development in Stone and the rest of the Borough should ensure the flexibility and deliverability of the Plan in terms of employment growth. Employment development should relate to both traditional and non-traditional employment, to allow the Policy to be flexible to respond to changing markets. The Council should also consider allocating mixed use policies and proposals to contribute to the flexibility of the Plan.

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	The Garden Centre Group ( )
<b>Comment ID</b>	PS528
<b>Response Date</b>	27/02/13 15:16
<b>Consultation Point</b>	7 SPATIAL PRINCIPLE 7 (SP7) ? SUPPORTING THE LOCATION OF NEW DEVELOPMENT ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	0.3

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

We strongly support the preference for brownfield land demonstrated in SP7. We do, however, recommend that this principle should also apply to development located outside of the Borough's towns and villages. The redevelopment of vacant, brownfield sites should be supported in accordance with the NPPF, even when located outside of the development limits, providing it contributes to sustainable development.

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	The Garden Centre Group ( )
<b>Comment ID</b>	PS529
<b>Response Date</b>	27/02/13 15:16
<b>Consultation Point</b>	14 Policy E1 ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	0.3

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

We agree with the general principles of Policy E1 in terms of its aims to sustain the local economy through economic development. We recommend that reference should be made to mixed use policies and allocations in terms of the diversification of new economic development. The Policy should acknowledge that non-traditional employment, such as leisure, tourism, retail and care can contribute to sustaining the local economy through generating a significant amount of jobs.



## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	The Garden Centre Group ( )
<b>Comment ID</b>	PS530
<b>Response Date</b>	27/02/13 15:16
<b>Consultation Point</b>	15 Policy E2 ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	0.3

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

We largely support the principles of Policy E2 relating to areas outside of the Settlement Limits. In order to ensure the Plan is flexible to respond to growth, it is essential that development needs be met across the Borough.

We strongly agree with the approach in favour of brownfield land, which fully supports the NPPF. As aforementioned, it should be recognised that development proposals for the re-use of vacant brownfield sites can help to enhance the landscape and setting of the surrounding area, where sensitively redeveloped.

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	The Garden Centre Group ( )
<b>Comment ID</b>	PS531
<b>Response Date</b>	27/02/13 15:16
<b>Consultation Point</b>	19 Policy E6 ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	0.3

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

We agree with the principles of Policy E6 in terms of the promotion of tourism and visitor accommodation. We would again suggest a preference is given to vacant, brownfield sites with regard to tourism development, particularly as the sensitive redevelopment of such sites can accord with the Policy's aims to enhance the landscape and character of the Borough.

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	The Garden Centre Group ( )
<b>Comment ID</b>	PS532
<b>Response Date</b>	27/02/13 15:16
<b>Consultation Point</b>	21 Policy E8 ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	0.4

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

We agree that Stafford and Stone Town Centres should remain the primary focus for town centre uses. Whilst the Policy does not reference such uses beyond the existing centres, we regard that small scale tourist and leisure uses should be favoured outside of the existing town and village centres where they re-use brownfield land, meet the needs of the locality and do not impact on the existing centres.

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	The KE Brandon Trust ( )
<b>Comment ID</b>	PS533
<b>Response Date</b>	28/02/13 11:53
<b>Consultation Point</b>	8 POLICY STAFFORD 1 ? STAFFORD TOWN ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough 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?** No, I do not wish to participate at the examination in public



Stafford Borough Council  
Forward Planning  
Civic Centre  
Riverside  
Stafford  
ST16 3AQ

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Email: [kiran.williams@bnpparibas.com](mailto:kiran.williams@bnpparibas.com)

Your ref:  
Our ref: Beaconside Stafford

28 February 2013

Dear Sir/Madam

## **Representations to The Plan for Stafford Borough Pre Submission Publication Land at Beaconside, Stafford.**

We write on behalf of our clients The KE Brandon Will Trust in respect of the above site. We have now had the opportunity to review the above document, and respectfully request that the Council consider the following.

We do not consider that the pre submission plan is '**Sound**', and has not been positively prepared, particularly with regards to proposed housing sites. The plan is not consistent or legally compliant and not in line with the National Planning Policy Framework, which seeks to ensure that local authorities have **Deliverable** five year housing land supplies.

We are in support of Stafford Borough Councils policies which direct future growth into Stafford especially given the dominant role of the town within the Borough. However we consider that the three strategic housing sites are not deliverable in the short term. All of the 5,560 net additional units to be allocated in Stafford are to be provided across three strategic locations (to the north, west and east of the town). Large scale strategic sites are not deliverable in the short term, particularly with regards to the infrastructure requirements and constraints, which render delivery.

Furthermore, we consider that the northern site is unlikely to deliver housing in the short term certainly within the timescale required to meet need arising from the MoD. From experience large and strategic sites require substantial upfront investment before development can proceed. This investment takes the form of, for example site access and distribution roads, new sewers and other service infrastructure. The other two strategic sites to the west and east of Stafford not only suffer from similar barriers to development but also first require substantial additional infrastructure.

We therefore question the housing strategy for Stafford, particularly in the short term the deliverability of the three strategic sites. The Proposed Local Plan fails to provide a sufficient basis for the delivery of housing targets. The proposed plan fails to provide sufficient choice and flexibility of housing sites and locations. We are therefore of the opinion that the local plan should make the provision for additional housing sites, which do not have the infrastructure constraints that the strategic sites do.



## **BNP PARIBAS REAL ESTATE**

We are in support of Stafford Borough Local Plans policies relating to housing growth. The district is required by the National Planning Policy Framework (The Framework) to maintain a continued five year supply of deliverable (available, suitable, and achievable) sites as well as meeting its overall housing requirement.

We therefore propose that our client's site land off Beaconside be allocated for residential development within the Stafford Local Plan. Indeed, our client's site is located adjacent to the North Stafford Strategic site, and the Stafford RAF site, in a built up area of Stafford. This site would be capable of immediate development in order to address the short term issues of deliverability of housing.

Our clients site fulfils the requirements of the Framework, the site is deliverable, it is available now and offers a suitable location for development now, and is achievable with a realistic prospect that housing will be delivered on the site within five years and in particular development at the site will be viable.

The site has no infrastructure limitations. Significant interest is being shown by potential residential developers and there is no question that the site could be brought forward quickly to the housing market.

We therefore conclude that our client's site is:

- Physically suitable for residential development
- Has no significant infrastructure issues.
- Can provide a significant contribution to the Councils housing target.
- Is sustainable and deliverable.
- Can be brought forward quickly

We therefore respectfully request that our clients site be acknowledged as having residential potential, and be allocated as a residential site within the Stafford Local Plan. We enclose a site location plan for your reference. We look forward to receiving confirmation that our representations have been considered and should you require any further information please do not hesitate to contact me.

Yours faithfully

A handwritten signature in black ink that reads "K. Williams".

**For and on behalf of BNP Paribas Real Estate.**



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## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	G EDWARDS and HASZARD FAMILY ( )
<b>Comment ID</b>	PS534
<b>Response Date</b>	28/02/13 11:15
<b>Consultation Point</b>	8 POLICY STAFFORD 1 ? STAFFORD TOWN ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Justified
- . Effective



## **Representations Form**

(For official  
use only)

**Please return completed forms to:**

- Head of Planning & Regeneration, Stafford Borough Council, Civic Centre, Riverside, Stafford, ST16 3AQ
- or by email to [forwardplanning@staffordbc.gov.uk](mailto:forwardplanning@staffordbc.gov.uk)
- or by fax to: 01785 619473

**Responses must be received by 12 noon on Thursday 28<sup>th</sup> February 2013**

**This form has two parts:**

**Part A:** Personal Details

**Part B:** Your representations.

- Please complete Part B of this form for each representation you wish to make. You do not need to complete Part A more than once, but please ensure you state your name or organisation as applicable at the top of each Part B form you submit.
- Please refer to the attached guidance notes on making representations so that they address issues of legal compliance and / or soundness.
- Please note that when representations are submitted only Part B of the form will be published. Contact details on Part A will not be published.

# Part A

## I. Personal Details\*

\*If an agent is appointed please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

## 2. Agent's Details (if applicable)

Title	G EDWARDS and HASZARD FAMILY	MR
First Name		BEN
Last Name		McDYRE
Job Title (if applicable)		
Organisation (if applicable)		McDYRE & CO LTD
Address Line 1		18 CHURCH STREET
Address Line 2		FRODSHAM
Address Line 3		CHESHIRE
Address Line 4		
Postcode		WA6 6QL
Telephone Number		01928 735398
E-mail address		ben@mcdyre.co.uk

## Part B – Please use a separate sheet for each representation

Name or Organisation	McDYRE & CO ON BEHALF OF G EDWARDS AND HASZARD FAMILY
----------------------	---

**3. What part of The Plan for Stafford Borough (including the Policies Maps document) does your comment relate to?**

e.g. Policy Reference, Paragraph, Map title	POLICY STAFFORD I – STAFFORD TOWN
---	-----------------------------------

*If your comment does not relate to a specific part of the document, or it relates to a different document, for example the Sustainability Appraisal, please make this clear in your response.*

**4. Do you consider that the Plan for Stafford Borough is:**

- a. **Legally compliant\*?**  
Yes  No
- b. **Sound\*?**  
Yes  No

*To check a box when completing this form electronically, double click on it and select 'checked' under default value.*

*\*Please refer to the attached note for guidance on legal requirements and soundness.*

*If you have entered **No** to Q4.b. please continue to Q5. In all other circumstances please go to Q6.*

**5. Do you consider The Plan for Stafford Borough is unsound because it is not:**

- a. **Positively Prepared**
- b. **Justified**
- c. **Effective**
- d. **Consistent with national policy**

**6. Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

We agree with the approach preferred in Spatial Principle SP4 which concentrates most new development in the town of Stafford (72%). However, in terms of the distribution within Stafford, we would like to remind the Council of the submissions we made to the Plan for Stafford Borough (November 2011 consultation) which we set out again below.

The respondents' site at Old Croft Road, Walton on the Hill edged red on the plan attached, is on the southern edge of the town and is a strategic housing site in size (with a capacity of up to 670 houses (SHLAA) ref. 61). It is acknowledged that improvements are required to junctions on the A34 as detailed in our SHLAA submissions on behalf of the respondents. Negotiations are in hand with a third party landowner to release the land required to improve the highway network to allow development to proceed.

The situation at Old Croft Road is no different from that with regard to the three strategic sites to the north, west and east of Stafford since, as acknowledged and identified in the PSB, they are subject to a raft of physical constraints between them, including highways, improvements, major flood attenuation measures, major new electricity sub-station (north of Stafford), reinforcement of the water supply network with significant waste water infrastructure investment, delivery of the Western Access Improvement Scheme (west of Stafford), a new waste water pumping station, reinforcement of the water supply network and delivery of the Eastern Access Improvement Scheme and with no detailed alignment indicated (east of Stafford).

The Old Croft Road site at Walton on the Hill forms a natural extension to the urban area of Stafford. It can be brought forward at least in part through the Site Allocations DPD prior to construction of the southern section of the Eastern Distributor Road.

The Borough Council are urged to reconsider Old Croft Road, SHLAA Site 61, and include it as a strategic housing site in the Core Strategy, subject to construction of the Eastern Distributor Road, particularly as the route of part of the Eastern Distributor Road passes through the Old Croft Road site and whose allocation "for housing" would help in part to bring this relief road forward.

In line with Representations with regard to the Table of Housing Provision at para. 6.54 of SPB, the new dwelling provision for Stafford Town should be increased by 10% lifting the figure of 5,500 in Policy Stafford 1 – Stafford Town up to at least 6,116 (please note that the figure of 5,500 is not consistent with the Council's figure in the Table at para. 6.54 where this is shown as 5,560). The Old Croft Road site would make up the additional requirement in dwelling numbers.

(attach separate sheets as necessary)

- 7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough legally compliant or sound, having regard to the test you have identified at question 5. You will need to say why this change will make the document legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Substitute "5,500" by "at least 6,116" in Policy Stafford 1 – Stafford Town.

Add criterion b. to the Housing Section of the Policy to read as follows:- "South of Stafford at Old Croft Road, linked to delivery of the Eastern Distributor Road through to Cannock Road (A34)".

(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

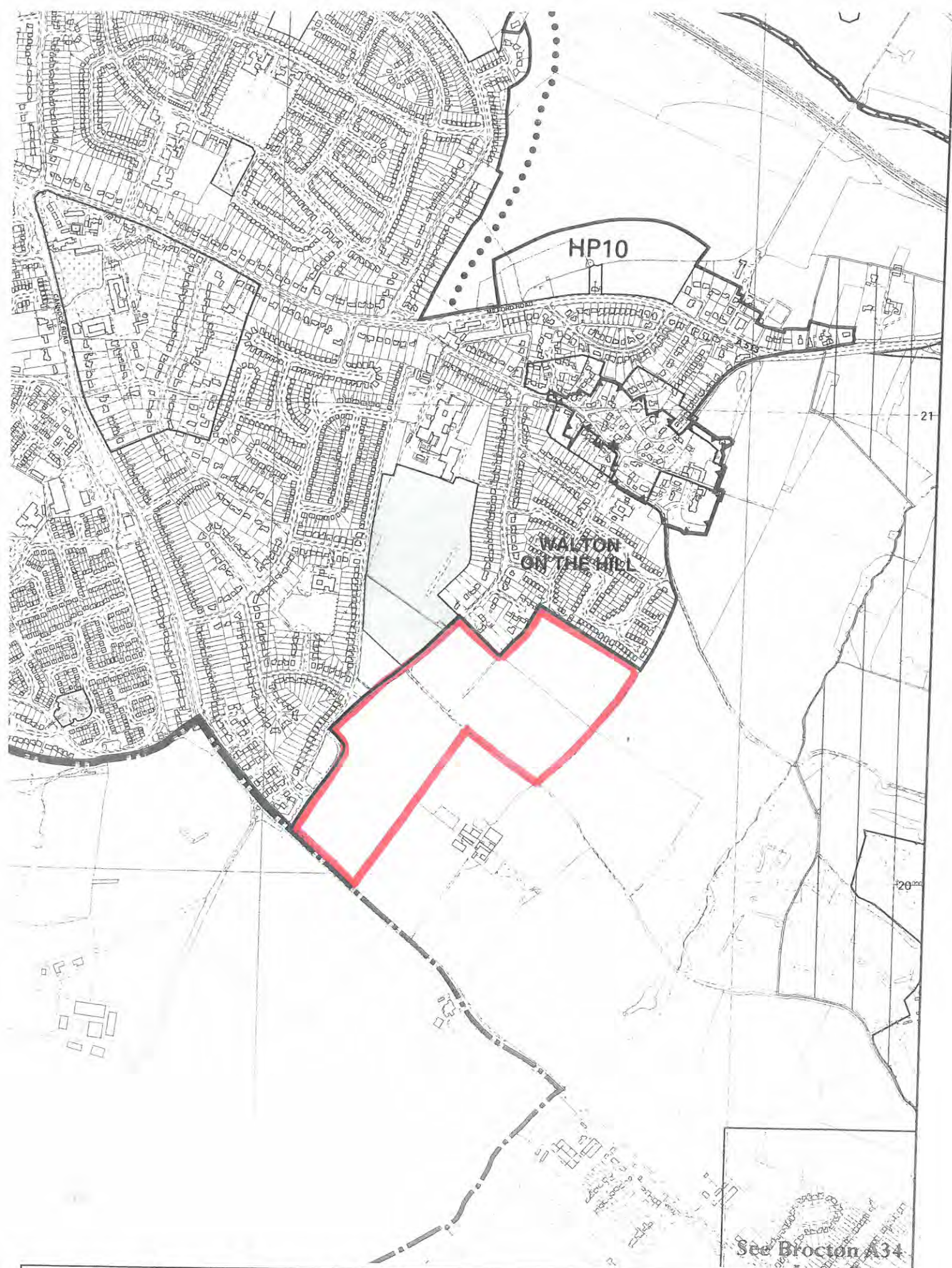
b. **No** I do not wish to participate at the Examination in Public

**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**



Land at Old Croft Road, Walton-on-the-Hill, Stafford



Proposed housing allocation on land owned by Mr G Edwards and Hazard family.

Scale 1:1000

McDyre & Co – Aug 2009

See Brocton A34

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	Blurton Poultry Farm ( )
<b>Comment ID</b>	PS535
<b>Response Date</b>	06/03/13 10:31
<b>Consultation Point</b>	4 SPATIAL PRINCIPLE 4 (SP4) ? STAFFORD BOROUGH HOUSING GROWTH DISTRIBUTION ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:** . Consistent with national policy

Our Ref: P908/MA  
Date: 27<sup>th</sup> February 2013

Grosvenor House  
75-76 Francis Road  
Edgbaston  
Birmingham B16 8SP

Forward Planning Section  
Stafford Borough Council  
Civic Centre  
Riverside  
Stafford  
ST16 3AQ.

T 0121 455 9455 F 0121 455 6595  
E info@harrislamb.com

Dear Sir or Madam

### **The Plan for Stafford Borough – Pre – Submission Document**

Thank you for providing Harris Lamb Planning Consultancy (HLPC) with the opportunity to participate in the preparation of 'The Plan for Stafford Borough – Pre Submission Document (January 2013)'. These representations have been prepared by HLPC on behalf of our client, the owner of Blurton Poultry Farm, Barlaston Road, Blurton, Stoke on Trent. The site is previously developed land within the Green Belt and previously operated as a Poultry Farm. This use has since ceased and at present the site is unoccupied / disused.

The site is located in a sustainable location on the edge of Blurton.

### **What part of The Plan for Stafford Borough does your comment relate to?**

Policy Spatial Principle 4 (SP4) –Stafford Borough Housing Growth Distribution and Paragraph 6.40

### **Do you consider that the Plan for Stafford Borough is legally compliant?**

Yes

### **Do You Consider the Plan for Stafford Borough to be Sound?**

No

Paragraph 6.40 is not sound because it is not consistent with National Policy.

- Paragraph 6.40 is not in accordance with paragraphs 81 and 89 of the NPPF. These paragraphs require Local Planning Authorities to enhance the beneficial use of the Green Belt.

We support Policy Spatial Principle 4 (SP4) –Stafford Borough Housing Growth Distribution because it directs 8% of the proposed housing requirement to the Rest of the Rural Areas, such as Blurton. This equates to a provision of 800 dwellings within the plan period.



However, we object to the second part of paragraph 6.40 because it states 'proportionally more development may need to be directed to other settlements in order to avoid the North Staffordshire Green Belt'. This paragraph specifically refers to Key Service Centres, however it is our understanding that this will equally apply to all of the settlements within Stafford BC. This is contrary to the Council's Sustainable Settlement Hierarchy and Paragraphs 81 and 89 of the NPPF. The Sustainable Settlement Hierarchy seeks to direct development based on the sustainable credentials and the ability of the settlement to accommodate growth.

My client owns a previously developed site in the green belt. This should be considered more appropriate for residential development than developments on Greenfield sites on the edge of less sustainable settlements. It is not logical to direct developments to locations on Greenfield sites on the edge of Rural of Rural Areas while rejecting previously developed sites in the Green Belt in more sustainable locations.

Blurton is a sustainable settlement and more sustainable than some of the Key Service Centres and the Rest of the Rural Areas. Furthermore, paragraphs 81 and 89 have introduced a change in the way in which proposals on brownfield sites in the Green Belt should be considered. There is now an emphasis for Local Planning Authorities to enhance the beneficial use of the Green Belt and to improve damaged and derelict land. In addition, paragraph 89 allows the "limited infilling or partial or complete redevelopment of previously developed sites (brownfield) land, whether redundant or in continuing use, which would not have a greater impact on the openness of the Green Belt and purpose of including land within it than the existing development".

My client's site adjoins the existing settlement boundary and is capable of providing a sustainable development. Indeed, in the dismissed planning appeal the inspector did not raise any concerns about the issue of sustainability. It is, therefore, our view that the redevelopment of the site for a modest residential scheme would be compatible in land use terms and would provide the opportunity to achieve a material benefit by returning part of the site to an open countryside use which would enhance the setting of the edge of the settlement and improve the appearance and character of the Green Belt. It would also remove the possibility of a bad neighbour use being reinstated. The redevelopment of the site will also redevelop an unsightly, derelict brownfield site.

In order to comply with the NPPF, the plan should be amended to allow the limited infilling for residential development within the Green Belt. Previously developed sites within the Green Belt should be considered sequentially preferable to Greenfield sites on the edge of less sustainable settlements.

Yours sincerely



**Mark Alcock BA (Hons) MTCP MRTPI**

**Senior Planner**

mark.alcock@harrislamb.com

DIRECT DIAL: 0121-213-6024

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	Townson Estates PLC ( )
<b>Comment ID</b>	PS536
<b>Response Date</b>	28/02/13 10:20
<b>Consultation Point</b>	4 SPATIAL PRINCIPLE 4 (SP4) ? STAFFORD BOROUGH HOUSING GROWTH DISTRIBUTION ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Justified
- . Effective
- . Consistent with national policy

Our Ref: P908/MA  
Date: 27<sup>th</sup> February 2013

Grosvenor House  
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Forward Planning Section  
Stafford Borough Council  
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Stafford  
ST16 3AQ.

T 0121 455 9455 F 0121 455 6595  
E info@harrislamb.com

Dear Sir or Madam

### **The Plan for Stafford Borough – Pre – Submission Document**

Thank you for providing Harris Lamb Planning Consultancy (HLPC) with the opportunity to participate in the preparation of 'The Plan for Stafford Borough – Pre Submission Document (January 2013)'. These representations have been prepared by HLPC on behalf of our client, Townson Estates PLC. Townson Estates PLC own units 1 – 6, Walton Industrial Estate, Stone. We have previously submitted representations to the Strategic Policy Choices document on behalf of Townson Estates PLC in respect of this site.

A detailed review of the Pre-Submission document has been undertaken. Following this review we consider that a number of amendments are required to the Plan in order for it to be sound. The proposed amendments are detailed below.

#### **What part of The Plan for Stafford Borough does your comment relate to?**

Policy Spatial Principle 4 (SP4) – Stafford Borough Housing Growth Distribution

#### **Do you consider that the Plan for Stafford Borough is legally compliant?**

Yes

#### **Do You Consider the Plan for Stafford Borough to be Sound?**

Policy SP4 is not sound as it is not justified, effective, consistent with national policy or positively prepared and we have the following concerns:

- The level of housing proposed in the plan period does not relate to the 2008 Household Projections.
- The quantum of development allocated in Stone is too low and does not reflect the sustainability of the settlement.
- The distribution of development in Stafford Borough is inappropriate. It is not logical to allocate development to locations that are less sustainable while rejecting more sustainable locations higher up the Settlement Hierarchy.
- The means of directing growth in Stone is not in accordance with the NPPF.

## THE PROPOSED STRATEGIC HOUSING TARGET

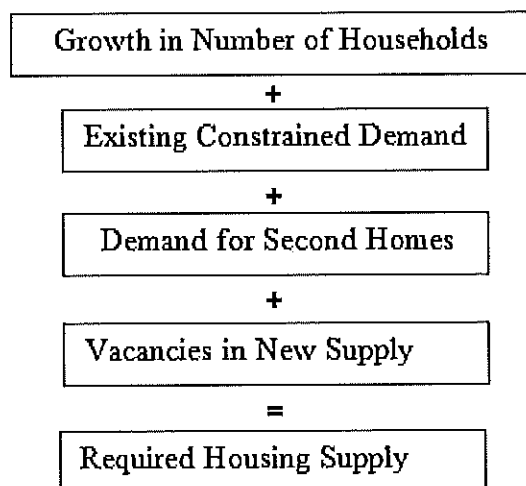
Policy SP4 – makes provision for the development of 10,000 dwellings during the course of the plan period. This does not correlate to the predicted increases in households during the same period and the level of housing that will be needed to accommodate the increases in households.

The NHPAU – Meeting the Housing Requirements of An Aspiring and Growing Nation, Taking the Medium and Long-term View, document was published in 2008 to provide guidance on testing strategic housing targets. Whilst this guidance was prepared to provide independent advice to the Government about the housing supply ranges to be tested in the preparation of RSS, its guidance on establishing housing targets can also be used to inform Local Plans housing targets.

The Demographic Method section of the plan provides guidance on establishing strategic housing targets through the 'Demographic Method'. It is advised in paragraph 76 of the NHPAU guidance that the demographic method is the

***'Traditional approach used by planning authorities when developing their housing plans. This so called project and provide method does not directly account for economic factors or changes in policy'.***

Figure 2 – Flowchart of the Demographic Method, of the NHPAU document sets out a four stage approach to establishing a housing requirement based upon the demographic method. This approach is set out below.



The table below sets out the housing requirement based upon the demographic method using the following information:

- 1) The predicted increase in the number of households during the course of the plan period is taken from the 2008 Households Projections.
- 2) The existing demand figure has been taken from Figure 69 – Current Housing Need – Strategic Housing Market Assessment (2008)
- 3) The number of second homes has been taken to be 1.1% of the housing stock. Paragraph 90 of the NHPAU Model advises that second homes make up of approximately 1.1% of England's housing stock and therefore this figure is considered to be robust.

- 4) The vacancy rate is 3%. Table B7, page 38 and paragraph B90 of the NHPAU document advises that the West Midlands has an average vacancy of 3.3%. Therefore the 3% figure is considered to be a robust estimate given that it is below what is currently achieved.

	Stafford Borough
Projected increase in households (ONS 2008 household projections – paragraph 6.11 of the Pre-Submission Document)	11,523
Existing Constrained Demand	1,031
Demand for Second Homes	1.1%
Vacancies in New Supply	3%
Required Housing	13,110

The Demographic Method has established that 13,110 dwellings should be provided in Stafford Borough. This is 3,110 dwellings more than the Plan proposes.

The housing target should be increased to a level where the household growth requirements are met. The NPPF paragraph 47 requires Local Policy to meet the “Full objectivity assessed need for market and affordable housing”. The Plan must, therefore, deliver at least 13,110 dwellings to achieve this requirement. To meet this requirement more housing should be directed towards Stone.

#### QUANTUM OF DEVELOPMENT ALLOCATED TO STONE

The level of housing development allocated to the town of Stone is too low. It is the second most sustainable settlement in the Borough; however it only receives one housing allocation which is expected to deliver approximately 500 dwellings. This a single greenfield site on the edge of the town and development will be phased after 2021.

Stone is a highly sustainable settlement and is capable of accommodating a significant level of development. This will ensure that the Borough meets their housing requirements and that the most sustainable sites are developed. At the very least Stone should continue to maintain its existing level of housing growth, which is 17%. This equates to 1,700 dwellings in the plan period of the proposed 10,000 dwellings required. However, the housing requirement should be increased to 13,110. This equates to 2,228 dwellings in the plan period. In order to meet this requirement more sites need to be brought forward for housing development.

#### THE DISTRIBUTION OF HOUSING GROWTH

We support the settlement strategy because it identifies Stafford as a priority location for development, followed by Stone (a second tier settlement) and then Key Service Villages (third tier settlements) and the Rest of Rural Areas. However, whilst we support the settlement strategy we object to the distribution of housing growth within the hierarchy. This is because too much development is directed towards the Key Service Villages and the Rest of Rural Areas (20%) and not enough development is proposed in Stone (8%).

This is considered to be contrary to the development strategy which seeks to direct development based on sustainable credentials and the ability of the settlement to accommodate growth. The distribution of housing growth also fails to accord with the Core Planning Principle 11 of the National Planning Policy Framework. Core Planning Principle 11 requires Local Planning Authorities to "actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling and focus significant development in locations which are or can be made sustainable". It is not logical to allocate development in locations that are less sustainable while rejecting more sustainable locations higher up the Sustainable Settlement Hierarchy.

Stone as the second most sustainable settlement in the Borough, should accommodate more development than is currently proposed (8%) and at the very least should continue to maintain its existing level of housing growth (17%). This equates to a figure of approximately 2,228 dwellings based on the revised housing requirement and represents a more balanced housing strategy. It will also ensure that Stafford is not overburdened with housing and less development is directed to the less sustainable settlements. Less development should take place in the Key Service Villages and only a limited amount of development should take place in the Rest of Rural Areas. Development in the Rest of Rural Areas should only meet a proven housing need.

### **THE MEANS OF DIRECTING GROWTH**


We do not support the Residential Development Boundaries or Industrial Area Boundaries and we would urge the Council to use this opportunity to remove them in favour of a settlement boundary around the whole of the built up edge of Stone with a criteria policy approach controlling development. There is no support for Residential Development Boundaries or Industrial Area Boundaries in the NPPF and it unduly restricts development which does not accord with the NPPF's pro-growth objectives.

The Residential Development Boundary in Stone is currently constraining sustainable housing growth, therefore, it should be removed or at very least revised to include additional land suitable for residential development. This would be in accordance with the NPPF which has a presumption in favour of sustainable development.

My client owns Units 1 – 6, Walton Industrial Estate, Stone. These units are located off Beacon Rise and could be redeveloped to provide a high quality residential development in a sustainable location. However, the site currently falls outside of the Residential Development Boundary and, therefore, residential development is resisted. The RDB should be reviewed at this location because my client's land is located within an established residential area and can be effectively assimilated into this area. My client's land is situated directly opposite residential properties and accessed off residential estate roads. It also remains a potential bad neighbour use.

The redevelopment of my client's land will achieve residential amenity improvements and improve access arrangements, as well as providing housing in a highly sustainable location. The site is located on a bus route and is within walking distance of a number of local shops and services, including a primary and secondary school. My client's site is more sustainable than the proposed allocation to the west of Stone.

Yours sincerely

A handwritten signature in blue ink, appearing to be 'Mark Alcock', written over the words 'Yours sincerely'.

**Mark Alcock BA (Hons) MTCP MRTPI**

***Senior Planner***

mark.alcock@harrislamb.com

DIRECT DIAL: 0121-213-6024

Email: clare.lucey@dtz.com

Direct Tel: 0121 697 7373

Direct Fax:



Your Ref:

Our Ref: ref

31 January 2013

Forward Planning  
Stafford Borough Council  
Civic Centre  
Riverside  
Stafford  
ST16 3AQ

DTZ

1 Colmore Square

Birmingham

B4 6AJ

Telephone: 0121 697 7373

Dear Sir/Madam

## **ROYAL MAIL GROUP REPRESENTATIONS:**

### **STAFFORD BOROUGH COUNCIL PLAN FOR STAFFORD – PRE-SUBMISSION CONSULTATION (2013)**

We are instructed by Royal Mail Group Ltd (Royal Mail) to submit representations to the Stafford Borough Council Plan for Stafford – Pre-Submission Consultation (2013)

#### **Background**

Royal Mail, formerly Consignia plc, is the successor to the former statutory corporation, The Post Office. Although its management operates independently, Royal Mail is wholly owned by the Government through the Secretary of State for Business, Innovation and Skills. Its services are regulated by Ofcom. Its letters business, Royal Mail, is the operator of universal postal functions through the Royal Mail letterpost delivery and collections services, handling letters, postal packets and high value (registered) packets. Royal Mail Group also operates Parcelforce Worldwide, which is a parcels carrier. Post Office Limited (a “sister” company to Royal Mail) operates the national network of post offices and sub post offices.

The United Kingdom letter post business has been fully liberalised since the Postal Services Act 2000 and Royal Mail now operates in a highly competitive market place. As such, it effectively operates like any other business and is continually seeking to find ways to improve the efficiency of its business (e.g. increased automation) and respond to the changes in communications technology (e.g. email and internet). Put simply, the nature of the mail industry has, and continues to change and Royal Mail’s real estate needs to respond accordingly.

#### **Royal Mail Properties**

Royal Mail has a statutory duty to provide efficient mail sorting and delivery for Stafford Borough Council’s administrative area. Royal Mail’s collection and delivery service for Stafford is provided from the following properties:

- Stafford Delivery Office/Office/Industrial site, Newport Road, Stafford (1128)
- Stone Delivery Office, Opal Way, Stone (189)
- Stafford Minor Hire, Stafford Road, Stafford (2011)

Of these, Royal Mail own the freehold of Stafford Delivery Office.



Royal Mail wish to emphasise the need to protect these sites from development that may adversely affect mail services provided from them and that should any land surrounding Royal Mail's sites be redeveloped, it would be vital that any new uses be designed and managed so that they are both cognisant of and sensitive to Royal Mail's operations.

Whilst Royal Mail currently has no plans for the redevelopment of their Delivery Offices or other sites, it should be noted that should the sites come forward as potential redevelopment sites then it is essential that as the sites are operational, the policy and/or supporting text to the inclusion of these sites explicitly state that the re-provision / relocation of Royal Mail's operations will be required prior to their redevelopment. This will ensure that Royal Mail's operations will not be prejudiced and they can continue to comply with their statutory duty to maintain a 'universal service' for the UK pursuant to the Postal Services Act 2000.

This approach accords with adopted Government guidance set out in the *National Planning Policy Statement (NPPF)* (March 2012) which advises that local planning authorities should help achieve economic growth by planning proactively to meet the development needs of business and support an economy fit for the 21st century. The *NPPF* also advises that local planning authorities should support existing business sectors, taking account of whether they are expanding or contracting. It also states that policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances (Paragraphs 20-21).

## **Representations**

The Plan will provide and safeguard an adequate supply of employment land and variety of land, buildings and utility services, including site expansions, conversion and re-use, for current and future employment uses for both small and large businesses (policy E1) and RMG support the inclusion of this policy.

The Stafford Delivery Office (1128) is located within the Stafford Development Boundary. Close to the Stafford DO is the west Stafford Strategic Housing Development Location (extending between the urban area and M6) which will deliver approximately 2,200 new homes of the 5,500 target for Stafford town. Stafford Rugby Ground and adjacent sports field west of the Delivery Office is also identified as a Strategic Employment Location, as is the Doxey Road Industrial Estate further north of the Delivery Office.

The Stone Delivery Office (189) falls outside the Stone Development boundary. The west Stone Strategic Housing Development Location will deliver approximately 500 new homes between 2021-2031. The Plan also identifies at least 10 ha of new employment land (again, after 2021) within a Strategic Employment Location south of Stone Business Park, south east of the Stone DO.

Both the Stafford and Stone Delivery Offices are operational, and it is important that any proposals that come forward in the forthcoming Neighbourhood Plan ensures that Royal Mail's operations will not be prejudiced and they can continue to comply with their statutory duty to maintain a 'universal service' for the UK pursuant to the Postal Services Act 2000.

Royal Mail has a statutory duty to provide efficient mail sorting and delivery for Stafford Borough Council's administrative area. As such, they are keen to be informed about plans for strategic levels of growth. The proposed growth of 5,500 dwellings at Stafford and 500 at Stone is therefore of particular interest to them.

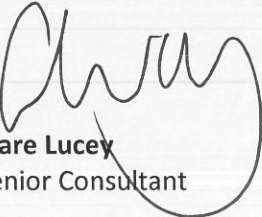
The scale of this proposed growth may place a significant burden on the existing Delivery Offices. The proposed growth of Stafford is significant and a consequence, it is possible that Royal Mail may require a new Stafford Delivery Office to handle the additional deliveries that will result from the planned growth.

As a statutory provider, Royal Mail may require the allocation of a new site for a new Delivery Office or developer contributions through S106 of the Town & Country Planning Act or Community Infrastructure Levy (CIL) as a valid recipient of infrastructure funds.

Royal Mail will continue to closely monitor plans for growth around Stafford and would welcome further discussion with the Council on the delivery of new infrastructure as the plans for the town evolve.

We request that Royal Mail is consulted on the forthcoming submission of the Plan for Stafford. All correspondence for Royal Mail should be sent to DTZ.

Yours Sincerely



**Clare Lucey**  
Senior Consultant



**The Plan for Stafford Borough  
Pre-Submission Consultation**

Ref:

**Representations Form**

**(For official  
use only)**

**Please return completed forms to:**

- Head of Planning & Regeneration, Stafford Borough Council, Civic Centre, Riverside, Stafford, ST16 3AQ
- or by email to [forwardplanning@staffordbc.gov.uk](mailto:forwardplanning@staffordbc.gov.uk)
- or by fax to: 01785 619473

**Responses must be received by 12 noon on Thursday 28<sup>th</sup> February 2013**

**This form has two parts:**

**Part A:** Personal Details

**Part B:** Your representations.

- Please complete Part B of this form for each representation you wish to make. You do not need to complete Part A more than once, but please ensure you state your name or organisation as applicable at the top of each Part B form you submit.
- Please refer to the attached guidance notes on making representations so that they address issues of legal compliance and / or soundness.
- Please note that when representations are submitted only Part B of the form will be published. Contact details on Part A will not be published.

# Part A

## 1. Personal Details\*

\*If an agent is appointed please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

## 2. Agent's Details (if applicable)

Title		Mrs
First Name		Kay
Last Name		Davies
Job Title (if applicable)		Partner
Organisation (if applicable)	The Inglewood Investment Company Ltd	Fisher German
Address Line 1		St Helens Court
Address Line 2		North Street
Address Line 3		Ashby de la Zouch
Address Line 4		Leicestershire
Postcode		LE65 1HS
Telephone Number		01530567476
E-mail address		kay.davies@fishergerman.co.uk

## Part B – Please use a separate sheet for each representation

Name or Organisation	The Inglewood Investment Company Ltd
----------------------	--------------------------------------

**3. What part of The Plan for Stafford Borough (including the Policies Maps document) does your comment relate to?**

e.g. Policy Reference, Paragraph, Map title	Paragraph 6.64 and Paragraph 6.66
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*If your comment does not relate to a specific part of the document, or it relates to a different document, for example the Sustainability Appraisal, please make this clear in your response.*

**4. Do you consider that the Plan for Stafford Borough is:**

a. **Legally compliant\*?**  
Yes  No

b. **Sound\*?**  
Yes  No

*To check a box when completing this form electronically, double click on it and select 'checked' under default value.  
\*Please refer to the attached note for guidance on legal requirements and soundness.*

*If you have entered **No** to Q4.b. please continue to Q5. In all other circumstances please go to Q6.*

**5. Do you consider The Plan for Stafford Borough is unsound because it is not:**

- a. **Positively Prepared**
- b. **Justified**
- c. **Effective**
- d. **Consistent with national policy**

**6. Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

The Vision for the Borough states that :

*'By 2031 the Borough's Villages will have:*

*a. delivered a range of new housing at villages to provide for local needs;'*

The Key Objectives of Areas outside Stafford and Stone goes on to state:

*'21. Provide for high quality new small scale housing development at appropriate villages that reflects their distinctive local character*

25. Provide new high quality homes, including new affordable homes, on appropriate sites in existing villages, to support sustainable rural communities in the future'

The Sustainable Development Hierarchy in Spatial Policy 3 (SPS) identifies Great Haywood as one of the Key Service Villages within the third tier below Stafford and Stone. Paragraph 6.27 and 6.31 confirm that there are sites identified within the SHLAA which can meet projected growth, subject to environmental constraints. Land at Little Tixall Lane, Great Haywood (SHLAA reference 174) is one such site that is identified as deliverable in the SHLAA.

In order to achieve this Vision, the Key Objectives, the requisite housing numbers (629 dwellings for Key Service Villages) and accord with the sustainable development hierarchy (SP3) there needs to be a clear delivery and implementation programme for realisation of this housing land supply. Paragraphs 6.63, 6.64, and 6.66 are all clear in identifying that there will be a need to review development boundaries around Key Service Villages. Therefore, it is paramount that a defined approach is established as to how and when village boundaries will be reviewed as the requirement of 629 dwellings cannot be met by sites within existing Key Service Village boundaries.

The proposed wording in Paragraphs 6.64 and 6.66 state that the review of village boundaries and identification of housing sites will ideally be determined through Neighbourhood Plans or if this is not forthcoming, through a Site-specific Allocations and Policies document. Significant concern is raised regarding this approach as it does not provide any degree of certainty as to when development sites in Key Service Villages might be identified. Furthermore there is a high probability that this approach will lead to inconsistency and, more specifically, there is a real concern that neither mechanism will come forward in the short term and housing provision will not be delivered in settlements outside Stafford of Stone. This will exacerbate the existing housing shortfall in the Borough and cause further delay in the deliverability of affordable housing where need is notably greater in rural areas.

(attach separate sheets as necessary)

**7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough legally compliant or sound, having regard to the test you have identified at question 5. You will need to say why this change will make the document legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

A clear commitment should be made to bring forward a Site Allocations and Policies Document which immediately follows the adoption of The Plan for Stafford Borough.

(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**



**REPRESENTATIONS TO THE PLAN FOR  
STAFFORD BOROUGH PUBLICATION (PRE-  
SUBMISSION)**

**FEBRUARY 2013**

**BARRATT WEST MIDLANDS**

27 February 2013

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# QUALITY MANAGEMENT

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Date:	<b>27 February 2013</b>
Project Number/Document Reference:	<b>JBB7407/1176</b>

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# 1 INTRODUCTION

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- 1.1 RPS Planning & Development (RPS) is retained by Barratt West Midlands (Barratt) to prepare representations to The Plan for Stafford Borough Publication (Pre-submission) consultation document, in respect of their land interests at North of Baswich, Stafford. The Publication document forms the next stage of the Core Strategy consultation process.
- 1.2 These representations relate primarily to Barratt's residential land interests at North of Baswich to the east of Stafford, as identified on the Site Location Plan at Appendix 1, which Barratt has been involved with in relation to delivery of the adjoining housing land since the 1980s.

## Scope of Current Consultation

- 1.3 RPS welcomes and supports the decision of Stafford Borough to continue with preparation of the Plan for Stafford Borough and the current consultation which is focusing specifically on the Publication (Pre-submission) document (January 2013).
- 1.4 The process of continuing the work on the Local Plan is supported which is essential to ensure a Development Plan led approach to development as advised in National Planning Policy Framework (NPPF) at paragraph 14, which states that local planning authorities should meet objectively assessed needs, with sufficient flexibility to adapt to change.
- 1.5 The purpose of this consultation is to consider whether the Plan for Stafford Borough complies with the tests set out in paragraph 182 of the NPPF which require the inspector and Secretary of State to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is "sound" – namely that it is:
- ***“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.”*

## Structure of Representations

- 1.6 Barratt has participated in the Local Development Framework process for Stafford Borough in order to ensure the development requirements and needs of Stafford Borough are appropriately addressed. RPS has made previous representations on behalf of Barratt to the Plan for Stafford Borough in terms of the Strategic Policy Choices in July 2012, the Draft Publication consultation in October 2011, the Core Strategy Local Choices consultation in January 2011, the Draft Core Strategy Policies consultation in April 2010, and the Core Strategy Issues and Options consultation in April 2009, as well as the Strategic Housing Land Availability Assessment (SHLAA) in November 2008.
- 1.7 RPS and Barratt have engaged with Stafford Borough Council (the Council) at all previous stages of the Core Strategy, as indicated above, based around a consistent theme of promoting their land interests, and the lack of any credible or justifiable evidence base supporting the full route of the Eastern Distributor Road (EDR) or previously referred to in the Strategic Policy Choices consultation the Eastern Access Improvement Scheme (EAIS). This engagement will continue through the remainder of the plan making process, including appearing at the Examination, with the aim of assisting the Council in producing a sound plan.
- 1.8 Section 2 comments on Stafford Borough's Housing Requirements. In order to provide the Inspector with an understanding of Barratt's approach to their land interests at North of Baswich Section 3 of these representations sets out comments specifically in relation to the continued safeguarding a route for the Eastern Distributor Road which could prevent the Baswich site coming forward for housing development. Section 4 sets out comments on specific paragraphs and policies within the Plan.
- 1.9 The format of the public consultation representation form seeks comments on specific paragraphs or policies and to whether the Plan is legally compliant and sound, and what proposed changes are considered necessary to make the Plan sound. Therefore to assist in the collation process, Sections 2, 3 and 4 of these representations follow the same format set out on the representation form.
- 1.10 Appendices to these representations comprises of a Site Location Plan (**Appendix 1**), an extract from the 2012 SHLAA (**Appendix 2**), correspondence on the 2013 SHLAA Review (**Appendix 3**) an extract from the Plan for Stafford Borough Policies Map (**Appendix 4**), and relevant extracts from the transport/infrastructure evidence base (**Appendix 5**).

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## 2 STAFFORD BOROUGH HOUSING REQUIREMENTS

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- 2.1 The intention of the National Planning Policy Framework (NPPF) is to significantly increase the delivery of new housing, and Local Planning Authorities have a responsibility in ensuring that they have a long-term supply of suitable land based on identified needs.

### **Spatial Principle 2 (SP2) – Stafford Borough Housing & Employment Requirements**

- 2.2 Spatial Principle 2 (SP2) proposes 500 dwellings per year (10,000 dwellings) over the plan period 2011 – 2031, not including additional requirements for military housing.

#### Plan Period

- 2.3 The plan period is proposed to be the 20 year period from 2011 to 2031. This is agreed with.

#### RS Panel's Report

- 2.4 Although Regional Strategies are to be revoked, the National Planning Policy Framework states that the evidence base for Regional Strategies are still to be taken into account in decision making by Local Planning Authorities until such time.

- 2.5 It is noted that in 2009, Stafford Borough Council supported the West Midlands RSS Panel Report's proposed level of housing growth of 11,000 net additional dwellings (550 per annum) in the Borough for the period 2006-2026, of which 8,000 dwellings would be at Stafford Town.

- 2.6 The WMRSS Phase 2 Revision Preferred Options had proposed the slightly lower figure of 10,100 dwellings (505 dwellings per annum), of which 7,000 would be at Stafford Town. The submitted Preferred Option requirement was based 2004 based household projections. The Panel took account of 2006 based information and advice from the Cambridge Housing and Planning Research Unit on the likely effects of the economic downturn in reaching their conclusions and recommendations. This remains the most recently independently and objectively tested housing requirement for Stafford Borough.

#### Population and Household Projections

- 2.7 Since 2009, there have been household projections based at 2008 and population projections based at 2010. The latest ONS Household Projections from 2008 to 2033 estimates an increase of 12,000 households within this period, with a growth in households from 53,000 to 65,000 by 2033. This is in line with the delivery proposed of 500 dwellings a year for the plan period. However, the 2008 projections do not take into account the increase in population as a result of the returning military personnel. The 2010 based population projections show an increase of 19,900 residents from 126,100 to 146,000 people in 2035. RPS therefore supports the Council's decision to include the housing requirement for military personnel as additional to the proposed 10,000 new dwellings in the Publication document. RPS, however, does not consider 500 dwellings a year to be an appropriate level of growth for the Borough.

- 2.8 In the recent planning appeal decision for development at the former Castleworks in Stafford (ref. APP/Y3425/A/12/2172968) the Inspector at paragraph 30 acknowledges that the Phase II RSS "will never be adopted by the Government. It is therefore not part of the development plan.

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*Nevertheless, its contents are based on Government housing projections and are the best examined figures that they have for housing.”* He went on to determine the appeal based upon the RSS requirement for 11,000 dwellings.

- 2.9 RPS understand the 2010 Household Projections are due out in March 2013 and therefore it is recommended that the Plan’s housing requirement and its SHMA 2012 evidence base should be re-visited on the basis of this up to date information being available.

### 3 EASTERN DISTRIBUTOR ROAD, STAFFORD

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- 3.1 This section sets out comments specifically in relation to the continued safeguarding of a route for the Eastern Distributor Road which could prevent land coming forward for housing development, including Barratt's land North of Baswich, Stafford.

#### Land North of Baswich, Stafford

- 3.2 Barratt has land interests at Land North of Baswich which is located within the existing residential development area to the east of Stafford, as shown on the attached Site Location Plan provided at **Appendix 1**.
- 3.3 The site is well contained between existing housing to the south and the railway line to the north, and is considered to be an appropriate and sustainable location for providing a residential development of approximately 35 dwellings which would contribute towards the housing needs for East of Stafford. A scheme would be appropriately designed and would include a mix of high quality housing of different types and tenure.
- 3.4 The site is available now and there are no legal or ownership constraints, so a residential scheme could be delivered in full within the first five years of the plan period. There are also no constraints to development in terms of land use, as the site is not located within a flood risk area or landscape protection area, and does not contain any historic buildings.
- 3.5 There is additional land to the east of the site, identified by the arrow on the Site Location Plan (**Appendix 1**), which could provide a landscaped area of public open space. This additional land would form appropriate public open space to serve both the development of Barratt's land control as well as serving the wider Baswich area. Additionally there is evidence in the Council's published PPG17 Assessment, and confirmed in Policy Stafford 1, which indicates that there is a need to increase the number and quality of allotments and provision of high quality green spaces across Stafford. New allotments for community use could be provided on this adjoining land as part of the development proposals.
- 3.6 Therefore the promoted site is considered to be a sustainable location for growth, due to the surrounding land uses, which would deliver a proportion of the Borough's housing requirements and contribute towards new sustainable housing provision for the East of Stafford Town.

#### Stafford Borough Local Plan 2001

- 3.7 The site is shown on the Proposals Map for the Stafford Borough Local Plan 2001 adopted in October 1998 as being located within the Residential Development Boundary of Stafford and forms part of housing allocation HP2 - North Baswich. The supporting text for allocation HP2 states:

*"Part of the route of the Stafford Eastern Bypass (SEB) proposal runs through the site along its northern edge. The route is protected from development and therefore to be taken into account in the development of the site. The developer of the site should therefore discuss the requirements for the provision of the Stafford Eastern Bypass with the Highway Authority. The aim should be to maximise the developable area of the site taking into account protecting the SEB route."*

3.8 Policy MV7 – Proposed New Roads specifically covers the Stafford Eastern Bypass and states “The Borough Council will safeguard from development land required for the Stafford Eastern Bypass as shown on the Proposals Map.”

3.9 The safeguarded route shown on the Proposals Map crosses Barratt’s land North of Baswich and the restrictive policy has prevented the site coming forward for residential development.

RS Panel’s Report

3.10 The RS Panel’s Report specifically questions the deliverability of the proposed road at paragraph 8.128, stating:

*“A scheme for completing the eastern distributor road has been around for many years, but it would involve costly bridge works and only release limited additional development land. Consequently, its form might require reconsideration if it is ever to be realised.”*

Strategic Housing Land Availability Assessment

3.11 The site (**Appendix 1**) was put forward for consideration in the Strategic Housing Land Availability Assessment (SHLAA). Given the SHLAA Site Reference 277 – Land at North Baswich, Stafford, the site is incorrectly listed in the 2012 SHLAA under Table i.5 as a Developable Site identified *outside Residential Development Boundaries* (**Appendix 2**).

3.12 A review of the SHLAA is now underway and the site proforma has recently been forwarded by Stafford Borough Council for comments to be incorporated into the 2013 SHLAA (**Appendix 3**). The 0.9ha site is correctly stated as being within the Residential Development Boundary and is estimated as being suitable for approximately 27 homes. The site is assessed as being available but it is stated “the site is part of the proposed eastern by pass route”. The final conclusion is that the site is developable in years 2017-2022.

**The Plan for Stafford Borough Publication (Pre-submission) document (January 2013)**

3.13 RPS has submitted representations at all previous stages of the Plan for Stafford Borough identifying that the Eastern Distributor Road (EDR) is not considered to be the most appropriate method of securing sustainable transport provision and that the route which was safeguarded from development by the Local Plan 2001 (Policy MV7) should not be retained as there is no evidence to demonstrate that the proposed route will be funded or delivered within the Plan Period.

3.14 The Plan for Stafford Borough Publication (Pre-submission) document makes reference to the EDR on numerous occasions. At paragraph 5.2 of the Plan the implementation of Phase 1 of the EDR is listed as Key Objective 11 for Stafford. This route is from Weston Road/Beaconside to Baswich Lane road bridge at St Thomas’. Phase 1 of the EDR is also referenced in Policy Stafford 1 – Stafford Town.

3.15 Policy Stafford 4 proposes 600 dwellings to be delivered at a Strategic Development Location to the East of Stafford. It is indicated that delivery of these dwellings will be subject to the provision of **Phase 1** of the EDR from Weston Road to Baswich Lane road bridge at St Thomas’. The route of the proposed new road is shown on the Stafford East Concept Diagram on page 60.



- 3.16 Paragraph 10.5 refers to “the Eastern Distributor Road at Stafford’ and states that “Staffordshire County Council currently identify a number of protected routes within Stafford Borough as shown on the Policies Map.” RPS would question where the County Council have identified protected routes as neither the text of the Plan nor the Local Transport Plan identify proposals for further phases of the Eastern Distributor Road during the plan period.
- 3.17 The Policies Map (Proposals Map) shows a route for the proposed Distributor Road which extends beyond the Phase 1 element from Weston Road to Baswich Lane road bridge at St Thomas’ required by Policy Stafford 4. The route runs through Barratt’s site at North Baswich, as shown on the Policies Map (Proposals Map) extract at **Appendix 4**. The Policies Map (Proposals Map) should not safeguard land for a road which is not being proposed within the Plan or during the plan period and is not justified by the evidence base.
- 3.18 The use of the term ‘Phase 1’ is misleading as it suggests that further phases of the EDR are proposed to be delivered within the Plan Period. This is not the case. Whilst the Council has stated through previous consultations that the EDR is required for development east of Stafford to take place, the Plan is silent on the delivery of any further phases of the EDR other than the Phase 1 route required in order to deliver the proposed 600 dwellings for Policy Stafford 4. Therefore the inclusion of a longer route on the Policies Map (Proposals Map) is not justified and not referenced within the text of the document.

#### **Transport/Infrastructure Evidence Base**

- 3.19 It is acknowledged that new road infrastructure will be required where it is both justified (with an appropriate evidence base) and fully deliverable (with sufficient identifiable funding and an implementable route) to mitigate against the impact of development.
- 3.20 In preparing the Plan the Council will need to fully justify infrastructure provision in accordance with national planning policy, and not introduce policies that cannot be implemented. This will require supporting evidence of what physical infrastructure is required along with ‘who will provide the infrastructure and when it will be provided’ which will need to be set out within a costed Infrastructure Delivery Plan.
- 3.21 RPS has therefore undertaken a review of the transport/infrastructure evidence base for the Plan, specifically in relation to the EDR. Relevant extracts referred to below are provided in **Appendix 5**.
- 3.22 The evidence base comprises of the following documents:
- Stafford Borough Infrastructure Strategy Report (July 2009)
  - Local Transport Plan 2011 (April 2011)
  - Draft Stafford Borough Integrated Transport Strategy 2011 – 2026 (November 2011)
  - Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (July 2012)

Stafford Borough Infrastructure Strategy Report (July 2009)

3.23 The Local Planning Authority commissioned the Stafford Borough Infrastructure Strategy Report in July 2009 which **casted considerable doubt over the implementation** of the EDR, particularly south of the A34 due to the following:

- *significant technical difficulties in terms of alignments close to residential areas;*
- *the need to cross the West Coast Main Line and replace a railway bridge with the time and cost that would involve;*
- *the absence of any allocated funding in the current Regional Funding Allocation or Local Transport Plan;*
- *and the fact that developer contributions are unlikely to provide for the full cost of the road (not helped by the fact that the W S Atkins study demonstrates that an Eastern Distributor Road is not required to facilitate the achievement of the 7,000 homes target for Stafford).*

3.24 Given that the Plan currently proposes housing growth to the east and west of Stafford which is dependent upon infrastructure improvements, RPS does not consider this document to be an appropriate evidence base to justify those proposals. The Infrastructure Strategy Report was undertaken in 2009 and does not support the EDR.

Local Transport Plan 2011 (April 2011)

3.25 Commitment to any strategic road proposals requires inclusion within the Local Highway Authorities (LHA) Local Transport Plan. In this respect, it is highly relevant that Staffordshire County Council as the LHA published its third Local Transport Plan 2011 (LTP) on 1 April 2011.

3.26 The LTP sets out the proposals for transport provision within the county, including walking, cycling, public transport, car based travel and freight together with the management and maintenance of local roads and footways. It also includes new road proposals, and significantly **this does not include any reference to the EDR for Stafford.**

3.27 It refers to Stafford being seen as a Growth Point and indicates that without the provision of additional highway capacity the projected levels of growth at the town are likely to result in congestion, especially during weekday peak periods, on routes west of Stafford and within the town centre. The LTP indicates the LHA are planning a range of measures to mitigate for this, including the construction of a new road – the Western Access Improvement Scheme (WAIS). The LTP at page 19 states:

*“the forecast travel demand associated with the town’s predicted growth will lead to congestion, especially during weekday peak periods along routes within the west of Stafford and the town centre. In order to mitigate this, we are planning a range of sustainable transport measures, together with the construction of a new road. This road will connect the A518 Newport Road to the A34 Foregate Street via Doxey Road. Despite the Government’s recent decision not to fund the proposed road within the current spending review period, we continue to support the scheme and are considering alternative funding opportunities to secure its delivery.”*

3.28 This gives a clear indication that the County Council as LHA support the need for the WAIS and consider implementation of that particular road scheme along with other transport measures will provide the necessary additional highway capacity and be sufficient to mitigate against predicted

congestion as a result of the planned new homes in Stafford Borough. In addition as the Government have decided not to fund the scheme the LHA will be exploring all other funding opportunities in order to secure its delivery. In contrast the EDR is not mentioned in the LTP which in RPS' view clearly indicates that the County Council does not consider there to be a need or basis for the scheme.

*Draft Stafford Borough Integrated Transport Strategy 2011 – 2026 (November 2011)*

3.29 The Draft Stafford Borough Integrated Strategy 2011 – 2026 indicates that a Stafford (urban) Transport Study is being produced as evidence to support the LDF. It states the assessment concludes the most efficient way for increasing households and jobs in Stafford is to focus the majority of greenfield development in the west and north of the town, with a smaller proportion in the east.

3.30 The document specifically refers to the provision of the EDR as an alternative strategy but dismisses it as follows:

**“An alternative strategy would be to allocate a far higher proportion of housing growth to the east of Stafford. However this would require the provision of the Stafford Eastern Bypass which is a far more expensive and environmentally damaging solution, and based upon the evidence from highway modelling, increased levels of congestion would result.”**

3.31 Clearly the provision of the EDR does not have the support of the County Council, contrary the statement at paragraph 10.5 of the Plan that they “currently identify a number of protected routes within Stafford Borough as shown on the Policies Map.” The route of the EDR should not be protected, apart from the specific section required in order to deliver the proposed 600 dwellings for Policy Stafford 4.

*Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (July 2012)*

3.32 The Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan produced by SKM Colin Buchanan indicates how the EDR Phase 1 and associated infrastructure improvements will be funded in parallel with the residential development through developer contributions and Staffordshire County Council funding. It estimates that the proposed access road between Weston Road and St Thomas Lane can be delivered within five years. The proposed capacity improvements in the vicinity of the Weston Road roundabout could also be delivered within five years.

3.33 The Stage 2 report also indicates that Baswich Lane capacity improvements could be delivered within 10 years. However, there is no timeframe proposed for when the new junction on Weston Lane and A513/A518 junction improvements will be delivered which are required to support the EDR, and therefore it is unclear whether these aspects of the scheme will come forward within the next 20 years. The report states that these improvements are not essential to bring forward development in the area.

3.34 Whilst the Stage 2 report provides some evidence of how the various elements of the infrastructure improvements east of Stafford are to be funded **there is no reference to further phases of the EDR or associated infrastructure requirements.**

## **Conclusion**

- 3.35 RPS accepts that the delivery of housing to the east of Stafford, as proposed by the Plan, is reliant upon the delivery of a new road from Weston Road to Baswich Lane road bridge at St Thomas', which is to be funded in part through developer contributions and therefore constructed in parallel with the proposed residential development.
- 3.36 Notwithstanding this the Policies Map (Proposals Map) safeguards a longer potential route for the EDR and the text within the Plan refers to Phase 1 which is misleading and suggests that there will be further phases of the EDR. Clearly the evidence base demonstrates that there is no justification for the continued safeguarding of the EDR. There are no proposals within the Local Transport Plan or the Infrastructure Delivery Plan to deliver and fund any additional sections of the EDR and the evidence demonstrates the opposite.
- 3.37 RPS therefore does not agree that land should be safeguarded as a potential route for future phases of the EDR when its delivery is not proposed within the Plan, or during the Plan Period, or supported by the evidence base. The Policies Map (Proposals Map) should only show policies, allocations and safeguarded land which are to be implemented up to 2031 for the Plan to be sound.
- 3.38 The NPPF advises that local plans should recognise the importance of identifying strategic priorities for specific areas, including the provision of infrastructure for transport where it has been identified as being an essential requirement. Therefore, RPS considers the Plan to be unsound as safeguarding land, including the site at North Baswich, for potential future phases of the EDR route, when it is not proposed to be delivered in the Plan, during the plan period and is not justified by the evidence base, makes the Plan not effective, justified or consistent with national policy.

### **Changes proposed to make the Plan sound:**

- 3.39 It is recommended that all references within the Plan and Policies Map (Proposals Map) to either the Eastern Distributor Road or Phase 1 of it should be revised to state "provision of a new road from Weston Road to Baswich Lane road bridge at St Thomas".
- 3.40 It is also recommended that the Policies Map (Proposals Map) should be amended to only show the new road from Weston Road to Baswich Lane road bridge at St Thomas', as proposed within the Plan. This should not be labelled as the Eastern Distributor Road but referred to as 'new road from Weston Road to Baswich Lane road bridge at St Thomas'. Any additional length of route shown on the Policies Map (Proposals Map) which is not proposed to be delivered as part of the Plan or within the plan period should be deleted.

## 4 PUBLICATION CONSULTATION RESPONSES

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### The Consultation

- 4.1 This section sets out, on the response forms provided, RPS's responses to the relevant policies and sections within The Plan for Stafford Borough Publication consultation document and supporting information, with particular reference to Barratt's land interests North of Baswich.
- 4.2 This section sets out comments on a number of paragraphs and policies within the Publication consultation document. .
- 4.3 The format of the public consultation representation forms has been followed in a table format with comments on specific paragraphs or policies, whether the Plan is legally compliant and sound, and what proposed changes are considered necessary to make the Plan sound.
- 4.4 ***RPS would wish to appear at Examination in relation to any policy or paragraph which have been indicated as unsound below.***

Paragraph or Policy	Legally compliant	Sound	Comments or Reasons for considering the Plan to be unsound	Changes proposed to make the Plan sound
References to the Eastern Distributor Road within the Plan and the identification of a safeguarded potential route on the Policies Map (Proposals Map)	Yes	Unsound - Not effective, justified or consistent with national policy	<p>RPS has submitted representations at all previous stages of the Plan for Stafford Borough identifying that the Eastern Distributor Road (EDR) is not considered to be the most appropriate method of securing sustainable transport provision and that the route which was safeguarded from development by the Local Plan 2001 (Policy MV7) should not be retained as there is no evidence to demonstrate that the proposed route will be funded or delivered within the Plan Period.</p> <p>The Plan for Stafford Borough Publication (Pre-submission) document makes reference to the EDR on numerous occasions. At paragraph 5.2 of the Plan the implementation of Phase 1 of the EDR is listed as Key Objective 11 for Stafford. This route is from Weston Road/Beaconside to Baswich Lane road bridge at St Thomas'. Phase 1 of the EDR is also referenced in Policy Stafford 1 – Stafford Town.</p> <p>Policy Stafford 4 proposes 600 dwellings to be delivered at a Strategic Development Location to the East of Stafford. It is indicated that delivery of these dwellings will be subject to the provision of <b>Phase 1</b> of the EDR from Weston Road to Baswich Lane road bridge at St Thomas'. The route of the proposed new road is shown on the Stafford East Concept Diagram on page 60.</p> <p>Paragraph 10.5 refers to "the Eastern Distributor Road at Stafford" and states that "Staffordshire County Council currently identify a number of protected routes within Stafford Borough as shown on the Policies Map." RPS would question where the County Council have identified protected routes as neither the text of the Plan nor the Local Transport Plan identify proposals for further phases of the Eastern Distributor</p>	<p>It is recommended that all references within the Plan and Policies Map (Proposals Map) to either the Eastern Distributor Road or Phase 1 of it should be revised to state "provision of a new road from Weston Road to Baswich Lane road bridge at St Thomas".</p> <p>It is also recommended that the Policies Map (Proposals Map) should be amended to only show the new road from Weston Road to Baswich Lane road bridge at St Thomas', as proposed within the Plan. This should not be labelled as the Eastern Distributor Road but referred to as 'new road from Weston Road to Baswich Lane road bridge at St Thomas'. Any additional length of route shown on the Policies Map (Proposals Map) which is not proposed to be delivered as part of the Plan or within the plan period should be deleted.</p>

		<p>Road during the plan period.</p> <p>The Policies Map (Proposals Map) shows a route for the proposed Distributor Road which extends beyond the Phase 1 element from Weston Road to Baswich Lane road bridge at St Thomas' required by Policy Stafford 4. The route runs through Barratt's site at North Baswich, as shown on the Policies Map (Proposals Map) extract at <b>Appendix 4</b>. The Policies Map (Proposals Map) should not safeguard land for a road which is not being proposed within the Plan or during the plan period and is not justified by the evidence base.</p> <p>The use of the term 'Phase 1' is misleading as it suggests that further phases of the EDR are proposed to be delivered within the Plan Period. This is not the case. Whilst the Council has stated through previous consultations that the EDR is required for development east of Stafford to take place, the Plan is silent on the delivery of any further phases of the EDR other than the Phase 1 route required in order to deliver the proposed 600 dwellings for Policy Stafford 4. Therefore the inclusion of a longer route on the Policies Map (Proposals Map) is not justified and not referenced within the text of the document.</p> <p><b>Transport/Infrastructure Evidence Base</b></p> <p>It is acknowledged that new road infrastructure will be required where it is both justified (with an appropriate evidence base) and fully deliverable (with sufficient identifiable funding and an implementable route) to mitigate against the impact of development.</p> <p>In preparing the Plan the Council will need to fully justify infrastructure provision in accordance with national planning policy, and <u>not introduce policies that cannot be implemented. This will require supporting evidence of what physical infrastructure is required along with 'who will provide the infrastructure and when it will be provided'</u> which will need to be set out within a costed Infrastructure Delivery</p>	
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	<p>Plan.</p> <p>RPS has therefore undertaken a review of the transport/infrastructure evidence base for the Plan, specifically in relation to the EDR. Relevant extracts referred to below are provided in <b>Appendix 5</b>.</p> <p>The evidence base comprises of the following documents:</p> <ul style="list-style-type: none"> <li>• Stafford Borough Infrastructure Strategy Report (July 2009)</li> <li>• Local Transport Plan 2011 (April 2011)</li> <li>• Draft Stafford Borough Integrated Transport Strategy 2011 – 2026 (November 2011)</li> <li>• Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (July 2012)</li> </ul> <p><u>Stafford Borough Infrastructure Strategy Report (July 2009)</u></p> <p>The Local Planning Authority commissioned the Stafford Borough Infrastructure Strategy Report in July 2009 which <b>casted considerable doubt over the implementation</b> of the EDR, particularly south of the A34 due to the following:</p> <ul style="list-style-type: none"> <li>• <i>significant technical difficulties in terms of alignments close to residential areas;</i></li> <li>• <i>the need to cross the West Coast Main Line and replace a railway bridge with the time and cost that would involve;</i></li> <li>• <i>the absence of any allocated funding in the current Regional Funding Allocation or Local Transport Plan;</i></li> <li>• <i>and the fact that developer contributions are unlikely to provide for the full cost of the road (not helped by the fact that the W S Atkins study demonstrates that an Eastern Distributor Road is not required to facilitate the achievement of the 7,000 homes</i></li> </ul>	
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			<p><i>target for Stafford).</i></p> <p>Given that the Plan currently proposes housing growth to the east and west of Stafford which is dependent upon infrastructure improvements, RPS does not consider this document to be an appropriate evidence base to justify those proposals. The Infrastructure Strategy Report was undertaken in 2009 and does not support the EDR.</p> <p><u><i>Local Transport Plan 2011 (April 2011)</i></u></p> <p>Commitment to any strategic road proposals requires inclusion within the Local Highway Authorities (LHA) Local Transport Plan. In this respect, it is highly relevant that Staffordshire County Council as the LHA published its third Local Transport Plan 2011 (LTP) on 1 April 2011.</p> <p>The LTP sets out the proposals for transport provision within the county, including walking, cycling, public transport, car based travel and freight together with the management and maintenance of local roads and footways. It also includes new road proposals, and significantly <b><u>this does not include any reference to the EDR for Stafford.</u></b></p> <p>It refers to Stafford being seen as a Growth Point and indicates that without the provision of additional highway capacity the projected levels of growth at the town are likely to result in congestion, especially during weekday peak periods, on routes west of Stafford and within the town centre. The LTP indicates the LHA are planning a range of measures to mitigate for this, including the construction of a new road – the Western Access Improvement Scheme (WAIS). The LTP at page 19 states:</p> <p><i>“the forecast travel demand associated with the town’s predicted growth will lead to congestion, especially during weekday peak periods along routes within the west of Stafford and the town centre. In order</i></p>
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		<p>to mitigate this, we are planning a range of sustainable transport measures, together with the construction of a new road. This road will connect the A518 Newport Road to the A34 Foregate Street via Doxey Road. Despite the Government's recent decision not to fund the proposed road within the current spending review period, we continue to support the scheme and are considering alternative funding opportunities to secure its delivery."</p> <p>This gives a clear indication that the County Council as LHA support the need for the WAIS and consider implementation of that particular road scheme along with other transport measures will provide the necessary additional highway capacity and be sufficient to mitigate against predicted congestion as a result of the planned new homes in Stafford Borough. In addition as the Government have decided not to fund the scheme the LHA will be exploring all other funding opportunities in order to secure its delivery. In contrast the EDR is not mentioned in the LTP which in RPS' view clearly indicates that the County Council does not consider there to be a need or basis for the scheme.</p> <p><u>Draft Stafford Borough Integrated Transport Strategy 2011 – 2026 (November 2011)</u></p> <p>The Draft Stafford Borough Integrated Strategy 2011 – 2026 indicates that a Stafford (urban) Transport Study is being produced as evidence to support the LDF. It states the assessment concludes the most efficient way for increasing households and jobs in Stafford is to focus the majority of greenfield development in the west and north of the town, with a smaller proportion in the east.</p> <p>The document specifically refers to the provision of the EDR as an alternative strategy but dismisses it as follows:</p> <p><b><u>"An alternative strategy would be to allocate a far higher</u></b></p>
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		<p><b><u>proportion of housing growth to the east of Stafford. However this would require the provision of the Stafford Eastern Bypass which is a far more expensive and environmentally damaging solution, and based upon the evidence from highway modelling, increased levels of congestion would result.”</u></b></p> <p>Clearly the provision of the EDR does not have the support of the County Council, contrary the statement at paragraph 10.5 of the Plan that they “currently identify a number of protected routes within Stafford Borough as shown on the Policies Map.” The route of the EDR should not be protected, apart from the specific section required in order to deliver the proposed 600 dwellings for Policy Stafford 4.</p> <p><u>Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (July 2012)</u></p> <p>The Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan produced by SKM Colin Buchanan indicates how the EDR Phase 1 and associated infrastructure improvements will be funded in parallel with the residential development through developer contributions and Staffordshire County Council funding. It estimates that the proposed access road between Weston Road and St Thomas Lane can be delivered within five years. The proposed capacity improvements in the vicinity of the Weston Road roundabout could also be delivered within five years.</p> <p>The Stage 2 report also indicates that Baswich Lane capacity improvements could be delivered within 10 years. However, there is no timeframe proposed for when the new junction on Weston Lane and A513/A518 junction improvements will be delivered which are required to support the EDR, and therefore it is unclear whether these aspects of the scheme will come forward within the next 20 years. The report states that these improvements are not essential to bring forward</p>
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		<p>development in the area.</p> <p>Whilst the Stage 2 report provides some evidence of how the various elements of the infrastructure improvements east of Stafford are to be funded <b>there is no reference to further phases of the EDR or associated infrastructure requirements.</b></p> <p><b>Conclusion</b></p> <p>RPS accepts that the delivery of housing to the east of Stafford, as proposed by the Plan, is reliant upon the delivery of a new road from Weston Road to Baswich Lane road bridge at St Thomas', which is to be funded in part through developer contributions and therefore constructed in parallel with the proposed residential development.</p> <p>Notwithstanding this the Policies Map (Proposals Map) safeguards a longer potential route for the EDR and the text within the Plan refers to Phase 1 which is misleading and suggests that there will be further phases of the EDR. Clearly the evidence base demonstrates that there is no justification for the continued safeguarding of the EDR. There are no proposals within the Local Transport Plan or the Infrastructure Delivery Plan to deliver and fund any additional sections of the EDR and the evidence demonstrates the opposite.</p> <p>RPS therefore does not agree that land should be safeguarded as a potential route for future phases of the EDR when its delivery is not proposed within the Plan, or during the Plan Period, or supported by the evidence base. The Policies Map (Proposals Map) should only show policies, allocations and safeguarded land which are to be implemented up to 2031 for the Plan to be sound.</p> <p>The NPPF advises that local plans should recognise the importance of identifying strategic priorities for specific areas, including the provision of infrastructure for transport where it has been identified as being an essential requirement. Therefore, RPS considers the Plan to be</p>	
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			<p>unsound as safeguarding land, including the site at North Baswich, for potential future phases of the EDR route, when it is not proposed to be delivered in the Plan, during the plan period and is not justified by the evidence base, makes the Plan not effective, justified or consistent with national policy.</p>	
<b>Duty to Co-operate &amp; Cross-border issues (paragraph 3.12)</b>	Yes	Unsound - Not effective	<p>It is not clear from the Plan that the Localism and NPPF requirement for local authorities to fulfil a Duty to Co-operate with neighbouring authorities has been sufficiently demonstrated to ensure a consistent approach and to address issues that have cross-boundary implications.</p>	<p>It is recommended that the Plan should clearly demonstrate at paragraph 3.12 how the Duty to Co-operate with neighbouring authorities has been undertaken in accordance with NPPF paragraph 182.</p>
<b>Stafford Growth Point (paragraphs 3.15 – 3.17)</b>	Yes	Unsound - Not effective	<p>The Plan states that the Council remains committed to the Growth Point objectives and that the new Local Plan will have a key role in helping to deliver this growth.</p> <p>Given the 10,000 dwellings proposed by the Plan do not meet the WMRSS Panel's Report identified requirement for 11,000 dwellings then it is not considered this commitment to Stafford being a Growth Point has been addressed through the proposed housing provision.</p> <p>RPS understand the 2010 Household Projections are due out in March 2013 and therefore it is recommended that the Plan's housing requirement and its SHMA 2012 evidence base should be re-visited on the basis of this up to date information being available. This should be treated as a holding objection, subject to the 2010 Household Projections.</p>	<p>With the 2010 Household Projections due out in March 2013 it is recommended that the references to the Plan's housing requirement in paragraphs 3.15 – 3.17 should be re-visited on the basis of this up to date information being available.</p>
<b>Key Issues and Challenges (paragraph 4.1)</b>	Yes	Unsound - Not effective	<p>Under the sub-heading 'Delivering and Managing the Borough's Growth' it refers to Stafford Borough being designated as a Growth Point and that "The addition of more residential development will enable Stafford Borough to realise its full potential as a key sub</p>	<p>With the 2010 Household Projections due out in March 2013 it is recommended that references to the Plan's housing</p>

			<p>regional centre, facilitating sustainable economic growth and creating high value jobs and inward investment.”</p> <p>Given the 10,000 dwellings proposed by the Plan do not meet the WMRSS Panel’s Report identified requirement for 11,000 dwellings then it is not considered this commitment to Stafford being a Growth Point has been addressed through the proposed housing provision.</p> <p>RPS understand the 2010 Household Projections are due out in March 2013 and therefore it is recommended that the Plan’s housing requirement and its SHMA 2012 evidence base should be re-visited on the basis of this up to date information being available. This should be treated as a holding objection, subject to the 2010 Household Projections.</p>	<p>requirement in paragraph 4.1 should be re-visited on the basis of this up to date information being available.</p>
<p><b>Spatial Vision (paragraph 5.1)</b></p>	<p>Yes</p>	<p>Unsound - Not effective</p>	<p>The Spatial Vision states by 2031 the County Town of Stafford will have “provided an enhanced national and regional profile through major new housing and employment developments as the Growth Point, supported by a range of new infrastructure provision”.</p> <p>Given the Plan’s proposed level of housing growth of 10,000 dwellings does not even satisfy the WMRSS requirement for 11,000 dwellings it is not considered that the commitment to growth is supported through the proposed housing provision.</p> <p>RPS understand the 2010 Household Projections are due out in March 2013 and therefore it is recommended that the Plan’s housing requirement and its SHMA 2012 evidence base should be re-visited on the basis of this up to date information being available. This should be treated as a holding objection, subject to the 2010 Household Projections.</p>	<p>With the 2010 Household Projections due out in March 2013 it is recommended that the references to the Plan’s housing requirement in paragraph 5.1 should be re-visited on the basis of this up to date information being available.</p>
<p><b>Key Objectives – Stafford</b></p>	<p>Yes</p>	<p>Unsound - Not effective,</p>	<p>Key Objective 11 for Stafford proposes to “implement Phase 1 of the Eastern Distributor Road”.</p>	<p>It is recommended that all references within the Plan and</p>

<p><b>(paragraph 5.2)</b></p>		<p>or justified</p>	<p>The use of the phrase 'Phase 1' would suggest that further phases of the Eastern Distributor Road are proposed. This is neither proposed within the Plan nor justified by the evidence base of the Local Transport Plan. As further phases are not proposed to be delivered by the Plan or during the Plan Period maintenance of this approach is effectively 'blighting' land from its efficient use along its length and does not represent good planning. Any references to phases should be deleted.</p>	<p>Policies Map (Proposals Map) to either the Eastern Distributor Road or Phase 1 of it should be revised to state "provision of a new road from Weston Road to Baswich Lane road bridge at St Thomas".</p> <p>It is also recommended that the Policies Map (Proposals Map) should be amended to only show the new road from Weston Road to Baswich Lane road bridge at St Thomas', as proposed within the Plan. This should not be labelled as the Eastern Distributor Road but referred to as 'new road from Weston Road to Baswich Lane road bridge at St Thomas". Any additional length of route shown on the Policies Map (Proposals Map) which is not proposed to be delivered as part of the Plan or within the plan period should be deleted.</p>
<p><b>Spatial Principle 1 – Presumption in Favour of Sustainable</b></p>	<p>Yes</p>	<p>Unsound - Not effective</p>	<p>RPS is fully supportive of the Plan's overarching sustainable development principles to reflect the NPPF's presumption in favour of sustainable development and in accordance with NPPF paragraph 152 seeks opportunities to achieve each of the economic, social and environmental dimensions of sustainable development.</p> <p>NPPF paragraph 151 requires Local Plans to be prepared with the</p>	<p>It is recommended that the third paragraph be deleted as this replicates the provisions of NPPF paragraph 14.</p>

<b>Development</b>			<p>objective of contributing to the achievement of sustainable development and should be consistent with the principles and policies set out in the NPPF.</p> <p>Whilst supportive of the principles of the policy, the third paragraph appears to replicate the provisions of NPPF paragraph 14.</p>	
<b>The Borough-wide scale of housing and employment (paragraph 6.7)</b>	Yes	Unsound - Not effective or justified	<p>Paragraph 6.7 states a number of factors should be taken into account when establishing future housing requirements for the Borough, including past completion rates, existing commitments and information from the Strategic Housing Land Availability Assessment to show the potential scope for supply, population and household projections over the Plan Period.</p> <p>RPS are aware that the 2012 SHLAA contains errors in its assessment of the potential scope for supply from sites within the existing Residential Development Boundaries. For example Site Reference 277 North of Baswich, Stafford is incorrectly listed in the SHLAA under Table i.5 as a Developable Site identified outside Residential Development Boundaries. However the site is located within the Residential Development Boundary of Stafford (see <b>Appendix 2</b> of these representations) and should therefore be considered deliverable. Therefore it would appear that any assessment of available supply from within the urban areas is not appropriate or based on effective evidence.</p> <p>RPS understand the 2010 Household Projections are due out in March 2013 and therefore it is recommended that the Plan's housing requirement and its SHMA 2012 evidence base should be re-visited on the basis of this up to date information being available.</p>	<p>It is recommended that the 2013 SHLAA Review should ensure that all potential supply sites within the Residential Development Boundary have been fully taken into account.</p> <p>With the 2010 Household Projections due out in March 2013 it is recommended that the Plan's housing requirement and its SHMA 2012 evidence base should be re-visited on the basis of this up to date information being available. This should be treated as a holding objection subject to the 2010 Household Projections.</p>
<b>Spatial Principle 2 (SP2) –</b>	Yes	Unsound - Not effective or justified	<p>The intention of the National Planning Policy Framework (NPPF) is to significantly increase the delivery of new housing, and Local Planning Authorities have a responsibility in ensuring that they have a long-term</p>	<p>With the 2010 Household Projections due out in March 2013 it is recommended that the</p>



<p><b>Stafford Borough Housing &amp; Employment Requirements</b></p>		<p>justified</p>	<p>supply of suitable land based on identified needs.</p> <p>Spatial Principle 2 (SP2) proposes 500 dwellings per year (10,000 dwellings) over the plan period 2011 – 2031, not including additional requirements for military housing.</p> <p><u>Plan Period</u></p> <p>The plan period is proposed to be the 20 year period from 2011 to 2031. This is agreed with.</p> <p><u>RS Panel's Report</u></p> <p>Although Regional Strategies are to be revoked, the National Planning Policy Framework states that the evidence base for Regional Strategies are still to be taken into account in decision making by Local Planning Authorities until such time.</p> <p>It is noted that in 2009, Stafford Borough Council supported the West Midlands RSS Panel Report's proposed level of housing growth of 11,000 net additional dwellings (550 per annum) in the Borough for the period 2006-2026, of which 8,000 dwellings would be at Stafford Town.</p> <p>The WMRSS Phase 2 Revision Preferred Options had proposed the slightly lower figure of 10,100 dwellings (505 dwellings per annum), of which 7,000 would be at Stafford Town. The submitted Preferred Option requirement was based 2004 based household projections. The Panel took account of 2006 based information and advice from the Cambridge Housing and Planning Research Unit on the likely effects of the economic downturn in reaching their conclusions and recommendations. This remains the most recently independently and objectively tested housing requirement for Stafford Borough.</p> <p><u>Population and Household Projections</u></p>	<p>Plan's housing requirement and its SHMA 2012 evidence base should be re-visited on the basis of this up to date information being available.</p>
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<b>Spatial Principle (SP3)</b> <b>3</b> <b>-</b>	Yes	RPS supports the identification of the County Town of Stafford at the top of the Sustainable Settlement Hierarchy. It has the greatest potential to provide for major new development as it is located on the	N/A

<p><b>Stafford Borough Sustainable Settlement Hierarchy</b></p>			<p>national road and rail network and has the highest level of services and facilities in the Borough.</p> <p>The identification of the Market Town of Stone as second in the Hierarchy is also supported.</p>	
<p><b>Spatial Principle 4 (SP4) – Stafford Borough Housing Growth Distribution</b></p>	<p>Yes</p>	<p>Unsound - Not effective or justified</p>	<p>Spatial Principle 4 (SP4) proposes that in order to achieve the scale of new housing identified in Spatial Principle 2 (SP2), the annual targets for the distribution of housing, supported by necessary infrastructure, will be Stafford 72%, Stone 8%, Key Service Villages 12% and the Rest of the Rural Area 8%. The general direction of the majority of growth to Stafford is agreed with.</p> <p>Paragraph 6.40 notes that “new development will need to be provided, generally, outside of the existing built up areas of these settlements because the Strategic Housing Land Availability Assessment identifies insufficient infill sites to deliver the scale of new development required in most of the settlements.” This assessment has been based on the 2012 SHLAA. RPS consider that the SHLAA has not correctly assessed all infill sites within the settlements. For example Site Reference 277 North of Baswich, Stafford listed is in the SHLAA under Table i.5 as a Developable Site identified outside Residential Development Boundaries. However the site is located within the Residential Development Boundary of Stafford (see <b>Appendix 2</b> of these representations). Therefore there may be additional capacity within the settlements that has not been taken into consideration.</p> <p>Given the identification of Stafford at the top of the Sustainable Settlement Hierarchy under Spatial Policy 3 (SP3) it is considered that Stafford should have a higher proportion of the housing distribution than 72% in order to support its growth point aspirations.</p> <p>The dispersal of some 20% of the District's growth to Key Service Villages and the Rest of the Rural Area would not reflect the</p>	<p>It is recommended that the distribution of housing provision for Stafford should be increased to 80% and the distribution for Key Service Villages be reduced to 8% and the Rest of Rural Area to 4% accordingly.</p>

<p><b>Paragraph 6.54</b> – <b>Housing Provision Table</b></p>	<p>Yes</p>	<p>Unsound - Not consistent with national policy</p>	<p>sustainable development aims of the NPPF, particularly as three of the Key Service Villages (Barlaston, Tittensor and Yarnfield) are identified in the Plan as being constrained by being surrounded partly or wholly by Green Belt, whilst others do not have the same level of services and facilities.</p> <p>The Housing Provision Table at paragraph 6.54 indicates how the 10,000 homes proposed by the Plan will be provided in terms of completions, current commitments and new provision.</p> <p>The table fails to demonstrate how the new provision will be brought forward, other than through the Strategic Development Locations allocated within this Plan. It does not appear to make allowances for those sites within the settlements which will be allocated through the later Site-specific Policies and Allocations document (referred to at paragraphs 1.1 and 6.66)</p> <p>Nor does the table appear to make a windfall allowance for unallocated infill sites coming forward later in the Plan Period. This policy therefore contradicts Spatial Principles 7 (SP7) – Supporting the Location of New Development which states “Settlement boundaries will be defined to ensure that development within that boundary will, in principle, be acceptable”. Infill windfall development within the settlement boundaries has not been taken into account.</p> <p>NPPF paragraph 48 states “Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.”</p>	<p>It is recommended that the Housing Provision table should be adjusted to include allowances for sites which will be allocated through the later Site-specific Policies and Allocations document and to include an allowance for windfall development on infill sites later in the Plan Period.</p>
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<p><b>Spatial Principle 7 – Supporting the Location of New Development</b></p>	<p>Yes</p>	<p>Unsound - Not effective or consistent with national policy</p>	<p>RPS agrees with Spatial Principle 7 (SP7) which will establish new settlement boundaries for each of the settlements in the Sustainable Settlement Hierarchy defined in Spatial Principle 3 (SP3).</p> <p>The final paragraph of the policy states “Development proposals should maximise the use of brownfield redevelopment sites within the Borough’s towns and villages to reduce the need for greenfield sites. Only where insufficient sites on previously developed land, in sustainable locations, are available to meet new development requirements should greenfield sites be released.” However the sequential approach is no longer supported within the NPPF and this stance has been supported by the Secretary of State in a recent decision (Worsley, Manchester) where the local planning authorities have unsuccessfully tried to argue brownfield before greenfield.</p>	<p>It is recommended that the final paragraph of this policy should be deleted where this refers to prioritising brownfield land before greenfield land as this is not consistent with the principles and policies of the NPPF (paragraph 111).</p>
<p><b>Policy Stafford 1 – Stafford Town</b></p>	<p>Yes</p>	<p>Unsound - Not effective or justified</p>	<p>Policy Stafford 1 proposes Stafford Town will provide 5,500 new homes, including additional provision for Ministry of Defence personnel. This contradicts Spatial Principle 2 (SP2) which states that the provision of 500 dwellings per year <u>does not include</u> the additional requirements for military housing, and table at paragraph 6.54. This matter requires clarification and a consistent approach on whether provision of up to 400 new Service Family Accommodation units are included or are in addition to the 5,500 new homes proposed for Stafford Town.</p> <p>The policy states a range of development locations for new homes will be provided, and this will include new housing at three Strategic Development Locations, a. North of Stafford, b. West of Stafford, and c. East of Stafford.</p> <p>The Strategic Development Location East of Stafford is “linked to delivery of Phase 1 of the Eastern Distributor Road from Weston Road / Beaconside to Baswich Lane road bridge at St Thomas.” The use of the term ‘Phase 1’ would suggest that further phases of the Eastern</p>	<p>It is recommended that the policy be reworded to provide a clear approach on whether the 400 new Service Family Accommodation units are included or are in addition to the 5,500 new homes proposed for Stafford Town.</p> <p>It is recommended that all references within the Plan and Policies Map (Proposals Map) to either the Eastern Distributor Road or Phase 1 of it should be revised to state “provision of a new road from Weston Road to Baswich Lane road bridge at St Thomas”.</p>

		<p>Distributor Road are proposed within the Plan. Bullet point i) Under the sub-heading 'Infrastructure' again makes reference to "Phase 1" of the Eastern Distributor Road.</p> <p>The Policies Map (Proposals Map) shows a route for the proposed Distributor Road which extends beyond the Phase 1 element from Weston Road to Baswich Lane road bridge at St Thomas' required by Policy Stafford 4. The route runs through Barratt's site at North Baswich, as shown on the Policies Map (Proposals Map) extract at <b>Appendix 4</b>. The Policies Map (Proposals Map) should not safeguard land for a road which is not being proposed within the Plan or during the plan period and is not justified by the evidence base.</p> <p>The use of the term 'Phase 1' is misleading as it suggests that further phases of the EDR are proposed to be delivered within the Plan Period. This is not the case. Whilst the Council has stated through previous consultations that the EDR is required for development east of Stafford to take place, the Plan is silent on the delivery of any further phases of the EDR other than the Phase 1 route required in order to deliver the proposed 600 dwellings for Policy Stafford 4. Therefore the inclusion of a longer route on the Policies Map (Proposals Map) is not justified and not referenced within the text of the document.</p> <p><b>Transport/Infrastructure Evidence Base</b></p> <p>It is acknowledged that new road infrastructure will be required where it is both justified (with an appropriate evidence base) and fully deliverable (with sufficient identifiable funding and an implementable route) to mitigate against the impact of development.</p> <p>In preparing the Plan the Council will need to fully justify infrastructure provision in accordance with national planning policy, and <u>not introduce policies that cannot be implemented. This will require supporting evidence of what physical infrastructure is required along</u></p>	<p>It is also recommended that the Policies Map (Proposals Map) should be amended to only show the new road from Weston Road to Baswich Lane road bridge at St Thomas', as proposed within the Plan. This should not be labelled as the Eastern Distributor Road but referred to as 'new road from Weston Road to Baswich Lane road bridge at St Thomas'. Any additional length of route shown on the Policies Map (Proposals Map) which is not proposed to be delivered as part of the Plan or within the plan period should be deleted.</p>
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	<p>with <u>'who will provide the infrastructure and when it will be provided'</u> which will need to be set out within a costed Infrastructure Delivery Plan.</p> <p>RPS has therefore undertaken a review of the transport/infrastructure evidence base for the Plan, specifically in relation to the EDR. Relevant extracts referred to below are provided in <b>Appendix 5</b>.</p> <p>The evidence base comprises of the following documents:</p> <ul style="list-style-type: none"> <li>• Stafford Borough Infrastructure Strategy Report (July 2009)</li> <li>• Local Transport Plan 2011 (April 2011)</li> <li>• Draft Stafford Borough Integrated Transport Strategy 2011 – 2026 (November 2011)</li> <li>• Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (July 2012)</li> </ul>	
	<p><u>Stafford Borough Infrastructure Strategy Report (July 2009)</u></p> <p>The Local Planning Authority commissioned the Stafford Borough Infrastructure Strategy Report in July 2009 which <b>casted considerable doubt over the implementation</b> of the EDR, particularly south of the A34 due to the following:</p> <ul style="list-style-type: none"> <li>• <i>significant technical difficulties in terms of alignments close to residential areas;</i></li> <li>• <i>the need to cross the West Coast Main Line and replace a railway bridge with the time and cost that would involve;</i></li> <li>• <i>the absence of any allocated funding in the current Regional Funding Allocation or Local Transport Plan;</i></li> <li>• <i>and the fact that developer contributions are unlikely to provide</i></li> </ul>	

		<p><i>for the full cost of the road (not helped by the fact that the W S Atkins study demonstrates that an Eastern Distributor Road is not required to facilitate the achievement of the 7,000 homes target for Stafford).</i></p> <p>Given that the Plan currently proposes housing growth to the east and west of Stafford which is dependent upon infrastructure improvements, RPS does not consider this document to be an appropriate evidence base to justify those proposals. The Infrastructure Strategy Report was undertaken in 2009 and does not support the EDR.</p> <p><u>Local Transport Plan 2011 (April 2011)</u></p> <p>Commitment to any strategic road proposals requires inclusion within the Local Highway Authorities (LHA) Local Transport Plan. In this respect, it is highly relevant that Staffordshire County Council as the LHA published its third Local Transport Plan 2011 (LTP) on 1 April 2011.</p> <p>The LTP sets out the proposals for transport provision within the county, including walking, cycling, public transport, car based travel and freight together with the management and maintenance of local roads and footways. It also includes new road proposals, and significantly <b><u>this does not include any reference to the EDR for Stafford.</u></b></p> <p>It refers to Stafford being seen as a Growth Point and indicates that without the provision of additional highway capacity the projected levels of growth at the town are likely to result in congestion, especially during weekday peak periods, on routes west of Stafford and within the town centre. The LTP indicates the LHA are planning a range of measures to mitigate for this, including the construction of a new road – the Western Access Improvement Scheme (WAIS). The LTP at page 19 states:</p> <p><i>“the forecast travel demand associated with the town’s predicted</i></p>
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		<p>growth will lead to congestion, especially during weekday peak periods along routes within the west of Stafford and the town centre. In order to mitigate this, we are planning a range of sustainable transport measures, together with the construction of a new road. This road will connect the A518 Newport Road to the A34 Foregate Street via Doxey Road. Despite the Government's recent decision not to fund the proposed road within the current spending review period, we continue to support the scheme and are considering alternative funding opportunities to secure its delivery."</p> <p>This gives a clear indication that the County Council as LHA support the need for the WAIS and consider implementation of that particular road scheme along with other transport measures will provide the necessary additional highway capacity and be sufficient to mitigate against predicted congestion as a result of the planned new homes in Stafford Borough. In addition as the Government have decided not to fund the scheme the LHA will be exploring all other funding opportunities in order to secure its delivery. In contrast the EDR is not mentioned in the LTP which in RPS' view clearly indicates that the County Council does not consider there to be a need or basis for the scheme.</p> <p><u><i>Draft Stafford Borough Integrated Transport Strategy 2011 – 2026 (November 2011)</i></u></p> <p>The Draft Stafford Borough Integrated Strategy 2011 – 2026 indicates that a Stafford (urban) Transport Study is being produced as evidence to support the LDF. It states the assessment concludes the most efficient way for increasing households and jobs in Stafford is to focus the majority of greenfield development in the west and north of the town, with a smaller proportion in the east.</p> <p>The document specifically refers to the provision of the EDR as an</p>	
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alternative strategy but dismisses it as follows:

**“An alternative strategy would be to allocate a far higher proportion of housing growth to the east of Stafford. However this would require the provision of the Stafford Eastern Bypass which is a far more expensive and environmentally damaging solution, and based upon the evidence from highway modelling, increased levels of congestion would result.”**

Clearly the provision of the EDR does not have the support of the County Council, contrary the statement at paragraph 10.5 of the Plan that they “currently identify a number of protected routes within Stafford Borough as shown on the Policies Map.” The route of the EDR should not be protected, apart from the specific section required in order to deliver the proposed 600 dwellings for Policy Stafford 4.

Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (July 2012)

The Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan produced by SKM Colin Buchanan indicates how the EDR Phase 1 and associated infrastructure improvements will be funded in parallel with the residential development through developer contributions and Staffordshire County Council funding. It estimates that the proposed access road between Weston Road and St Thomas Lane can be delivered within five years. The proposed capacity improvements in the vicinity of the Weston Road roundabout could also be delivered within five years.

The Stage 2 report also indicates that Baswich Lane capacity improvements could be delivered within 10 years. However, there is no timeframe proposed for when the new junction on Weston Lane and A513/A518 junction improvements will be delivered which are required to support the EDR, and therefore it is unclear whether these aspects

		<p>of the scheme will come forward within the next 20 years. The report states that these improvements are not essential to bring forward development in the area.</p> <p>Whilst the Stage 2 report provides some evidence of how the various elements of the infrastructure improvements east of Stafford are to be funded <b><u>there is no reference to further phases of the EDR or associated infrastructure requirements.</u></b></p> <p><b>Conclusion</b></p> <p>RPS accepts that the delivery of housing to the east of Stafford, as proposed by the Plan, is reliant upon the delivery of a new road from Weston Road to Baswich Lane road bridge at St Thomas', which is to be funded in part through developer contributions and therefore constructed in parallel with the proposed residential development.</p> <p>Notwithstanding this the Policies Map (Proposals Map) safeguards a longer potential route for the EDR and the text within the Plan refers to Phase 1 which is misleading and suggests that there will be further phases of the EDR. Clearly the evidence base demonstrates that there is no justification for the continued safeguarding of the EDR. There are no proposals within the Local Transport Plan or the Infrastructure Delivery Plan to deliver and fund any additional sections of the EDR and the evidence demonstrates the opposite.</p> <p>RPS therefore does not agree that land should be safeguarded as a potential route for future phases of the EDR when its delivery is not proposed within the Plan, or during the Plan Period, or supported by the evidence base. The Policies Map (Proposals Map) should only show policies, allocations and safeguarded land which are to be implemented up to 2031 for the Plan to be sound.</p> <p>The NPPF advises that local plans should recognise the importance of identifying strategic priorities for specific areas, including the provision</p>
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<p><b>Policy Stafford 4 – East of Stafford</b></p>	<p>Yes</p>	<p>Unsound - Not effective</p>	<p>of infrastructure for transport where it has been identified as being an essential requirement. Therefore, RPS considers the Plan to be unsound as safeguarding land, including the site at North Baswich, for potential future phases of the EDR route, when it is not proposed to be delivered in the Plan, during the plan period and is not justified by the evidence base, makes the Plan not effective, justified or consistent with national policy.</p> <p>Policy Stafford 4 proposes the delivery of approximately 600 new homes and at least 20 hectares of new employment land to the East of Stafford as identified on the Policies Map (Proposals Map).</p> <p>The Policies Map (Proposals Map) is assumed to be the Development to the East of Stafford plan provided on page 59 which identifies three sites as Strategic Development Location Housing and one site as Strategic Development Location Employment.</p> <p>The key housing areas are to be located south of the A518 and Stafford Fire Station with the key employment area north of A518 extending the Beacon Park industrial location. It states the area will have implications for the Cannock Chase Special Area of Conservation which will require mitigation measures for recreational impacts, including the provision of Suitable Alternative Natural Greenspace (SANGs).</p> <p>Paragraph 7.34 highlights that the area is covered by limited public transport service, yet the transport section of the policy fails to require enhancements to public transport infrastructure which would raise doubts over the sustainability credentials of the site.</p> <p>Although the policy proposes approximately 600 new homes at the identified Strategic Development Locations no evidence to justify actual site capacity, taking into account on-site constraints, transport infrastructure requirements and open space/SANGs requirements has</p>		<p>It is recommended that the Plan should provide clear evidence to show how the Strategic Development Locations proposed by this policy have the capacity to deliver approximately 600 new dwellings, taking into account on-site constraints, transport infrastructure requirements and open space/SANGs requirements.</p> <p>It is recommended that the Plan should provide clear evidence of the viability of the Strategic Development Locations proposed by this policy to clearly demonstrate that the development and required infrastructure can be delivered.</p> <p>It is recommended that all references within the Plan and Policies Map (Proposals Map) to either the Eastern Distributor Road or Phase 1 of it should be</p>
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		<p>been provided. Therefore there are concerns that the numbers proposed may not be achievable or deliverable or that the development would be viable.</p> <p>Delivery of the 600 homes is subject to the provision of Phase 1 of the Eastern Distributor Road from Weston Road to Baswich Lane road bridge at St Thomas'. Potential costs are set out in Appendix D of the Plan and the significant cost implications would raise concern over the viability of the development.</p> <p>In addition the use of the phrase 'Phase 1' would suggest that further phases of the Eastern Distributor Road are proposed. This is neither proposed within the Plan nor justified by the evidence base of the Local Transport Plan and therefore as it not proposed to be delivered by the Plan or during the Plan Period references to phasing should be deleted.</p> <p>The Policies Map (Proposals Map) shows a route for the proposed Distributor Road which extends beyond the Phase 1 element from Weston Road to Baswich Lane road bridge at St Thomas' required by Policy Stafford 4. The route runs through Barratt's site at North Baswich, as shown on the Policies Map (Proposals Map) extract at <b>Appendix 4</b>. The Policies Map (Proposals Map) should not safeguard land for a road which is not being proposed within the Plan or during the plan period and is not justified by the evidence base.</p> <p>The use of the term 'Phase 1' is misleading as it suggests that further phases of the EDR are proposed to be delivered within the Plan Period. This is not the case. Whilst the Council has stated through previous consultations that the EDR is required for development east of Stafford to take place, the Plan is silent on the delivery of any further phases of the EDR other than the Phase 1 route required in order to deliver the proposed 600 dwellings for Policy Stafford 4. Therefore the inclusion of a longer route on the Policies Map (Proposals Map) is</p>	<p>revised to state "provision of a new road from Weston Road to Baswich Lane road bridge at St Thomas".</p> <p>It is also recommended that the Policies Map (Proposals Map) should be amended to only show the new road from Weston Road to Baswich Lane road bridge at St Thomas', as proposed within the Plan. This should not be labelled as the Eastern Distributor Road but referred to as 'new road from Weston Road to Baswich Lane road bridge at St Thomas". Any additional length of route shown on the Policies Map (Proposals Map) which is not proposed to be delivered as part of the Plan or within the plan period should be deleted.</p>
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	<p>not justified and not referenced within the text of the document.</p> <p><b>Transport/Infrastructure Evidence Base</b></p> <p>It is acknowledged that new road infrastructure will be required where it is both justified (with an appropriate evidence base) and fully deliverable (with sufficient identifiable funding and an implementable route) to mitigate against the impact of development.</p> <p>In preparing the Plan the Council will need to fully justify infrastructure provision in accordance with national planning policy, and <u>not introduce policies that cannot be implemented. This will require supporting evidence of what physical infrastructure is required along with 'who will provide the infrastructure and when it will be provided' which will need to be set out within a costed Infrastructure Delivery Plan.</u></p> <p>RPS has therefore undertaken a review of the transport/infrastructure evidence base for the Plan, specifically in relation to the EDR. Relevant extracts referred to below are provided in <b>Appendix 5</b>.</p> <p>The evidence base comprises of the following documents:</p> <ul style="list-style-type: none"> <li>• Stafford Borough Infrastructure Strategy Report (July 2009)</li> <li>• Local Transport Plan 2011 (April 2011)</li> <li>• Draft Stafford Borough Integrated Transport Strategy 2011 – 2026 (November 2011)</li> <li>• Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (July 2012)</li> </ul> <p><u><i>Stafford Borough Infrastructure Strategy Report (July 2009)</i></u></p> <p>The Local Planning Authority commissioned the Stafford Borough</p>	
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		<p>Infrastructure Strategy Report in July 2009 which <b>casted considerable doubt over the implementation</b> of the EDR, particularly south of the A34 due to the following:</p> <ul style="list-style-type: none"> <li>• <i>significant technical difficulties in terms of alignments close to residential areas;</i></li> <li>• <i>the need to cross the West Coast Main Line and replace a railway bridge with the time and cost that would involve;</i></li> <li>• <i>the absence of any allocated funding in the current Regional Funding Allocation or Local Transport Plan;</i></li> <li>• <i>and the fact that developer contributions are unlikely to provide for the full cost of the road (not helped by the fact that the W S Atkins study demonstrates that an Eastern Distributor Road is not required to facilitate the achievement of the 7,000 homes target for Stafford).</i></li> </ul> <p>Given that the Plan currently proposes housing growth to the east and west of Stafford which is dependent upon infrastructure improvements, RPS does not consider this document to be an appropriate evidence base to justify those proposals. The Infrastructure Strategy Report was undertaken in 2009 and does not support the EDR.</p> <p><u>Local Transport Plan 2011 (April 2011)</u></p> <p>Commitment to any strategic road proposals requires inclusion within the Local Highway Authorities (LHA) Local Transport Plan. In this respect, it is highly relevant that Staffordshire County Council as the LHA published its third Local Transport Plan 2011 (LTP) on 1 April 2011.</p> <p>The LTP sets out the proposals for transport provision within the county, including walking, cycling, public transport, car based travel and freight together with the management and maintenance of local roads and footways. It also includes new road proposals, and</p>
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		<p>significantly <b><u>this does not include any reference to the EDR for Stafford.</u></b></p> <p>It refers to Stafford being seen as a Growth Point and indicates that without the provision of additional highway capacity the projected levels of growth at the town are likely to result in congestion, especially during weekday peak periods, on routes west of Stafford and within the town centre. The LTP indicates the LHA are planning a range of measures to mitigate for this, including the construction of a new road – the Western Access Improvement Scheme (WAIS). The LTP at page 19 states:</p> <p><i>“the forecast travel demand associated with the town’s predicted growth will lead to congestion, especially during weekday peak periods along routes within the west of Stafford and the town centre. In order to mitigate this, we are planning a range of sustainable transport measures, together with the construction of a new road. This road will connect the A518 Newport Road to the A34 Foregate Street via Doxey Road. Despite the Government’s recent decision not to fund the proposed road within the current spending review period, we continue to support the scheme and are considering alternative funding opportunities to secure its delivery.”</i></p> <p>This gives a clear indication that the County Council as LHA support the need for the WAIS and consider implementation of that particular road scheme along with other transport measures will provide the necessary additional highway capacity and be sufficient to mitigate against predicted congestion as a result of the planned new homes in Stafford Borough. In addition as the Government have decided not to fund the scheme the LHA will be exploring all other funding opportunities in order to secure its delivery. In contrast the EDR is not mentioned in the LTP which in RPS’ view clearly indicates that the County Council does not consider there to be a need or basis for the</p>
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		<p>scheme.</p> <p><u><i>Draft Stafford Borough Integrated Transport Strategy 2011 – 2026 (November 2011)</i></u></p> <p>The Draft Stafford Borough Integrated Strategy 2011 – 2026 indicates that a Stafford (urban) Transport Study is being produced as evidence to support the LDF. It states the assessment concludes the most efficient way for increasing households and jobs in Stafford is to focus the majority of greenfield development in the west and north of the town, with a smaller proportion in the east.</p> <p>The document specifically refers to the provision of the EDR as an alternative strategy but dismisses it as follows:</p> <p><b><u>“An alternative strategy would be to allocate a far higher proportion of housing growth to the east of Stafford. However this would require the provision of the Stafford Eastern Bypass which is a far more expensive and environmentally damaging solution, and based upon the evidence from highway modelling, increased levels of congestion would result.”</u></b></p> <p>Clearly the provision of the EDR does not have the support of the County Council, contrary the statement at paragraph 10.5 of the Plan that they “currently identify a number of protected routes within Stafford Borough as shown on the Policies Map.” The route of the EDR should not be protected, apart from the specific section required in order to deliver the proposed 600 dwellings for Policy Stafford 4.</p> <p><u><i>Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (July 2012)</i></u></p> <p>The Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan produced by SKM Colin Buchanan indicates how the EDR Phase 1 and associated infrastructure improvements will be</p>
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			<p>There are no proposals within the Local Transport Plan or the Infrastructure Delivery Plan to deliver and fund any additional sections of the EDR and the evidence demonstrates the opposite.</p> <p>RPS therefore does not agree that land should be safeguarded as a potential route for future phases of the EDR when its delivery is not proposed within the Plan, or during the Plan Period, or supported by the evidence base. The Policies Map (Proposals Map) should only show policies, allocations and safeguarded land which are to be implemented up to 2031 for the Plan to be sound.</p> <p>The NPPF advises that local plans should recognise the importance of identifying strategic priorities for specific areas, including the provision of infrastructure for transport where it has been identified as being an essential requirement. Therefore, RPS considers the Plan to be unsound as safeguarding land, including the site at North Baswich, for potential future phases of the EDR route, when it is not proposed to be delivered in the Plan, during the plan period and is not justified by the evidence base, makes the Plan not effective, justified or consistent with national policy.</p>
<p><b>Paragraph 10.5</b></p>	<p>Yes</p>	<p>Unsound - Not effective, justified or consistent with national policy</p>	<p>Whereas other sections of the Plan which refer to “Phase 1” of the Eastern Distributor Road, this paragraph refers to “the Eastern Distributor Road at Stafford” If the RPS proposed recommended changes to delete all references in the Plan to “Phase 1” are implemented then this paragraph would be acceptable.</p> <p>The paragraph also refers to “Staffordshire County Council currently identify a number of protected routes within Stafford Borough as shown on the Policies Map.” RPS would question where the County Council have identified protected routes as neither the text of the Plan nor the Local Transport Plan identify proposals for further phases of the Eastern Distributor Road during the plan period. A route is shown on the Policies Map (Proposals Map) but this should be deleted as the</p> <p>It is recommended that all references within the Plan and Policies Map (Proposals Map) to either the Eastern Distributor Road or Phase 1 of it should be revised to state “provision of a new road from Weston Road to Baswich Lane road bridge at St Thomas”.</p> <p>It is also recommended that the Policies Map (Proposals Map) should be amended to only show</p>

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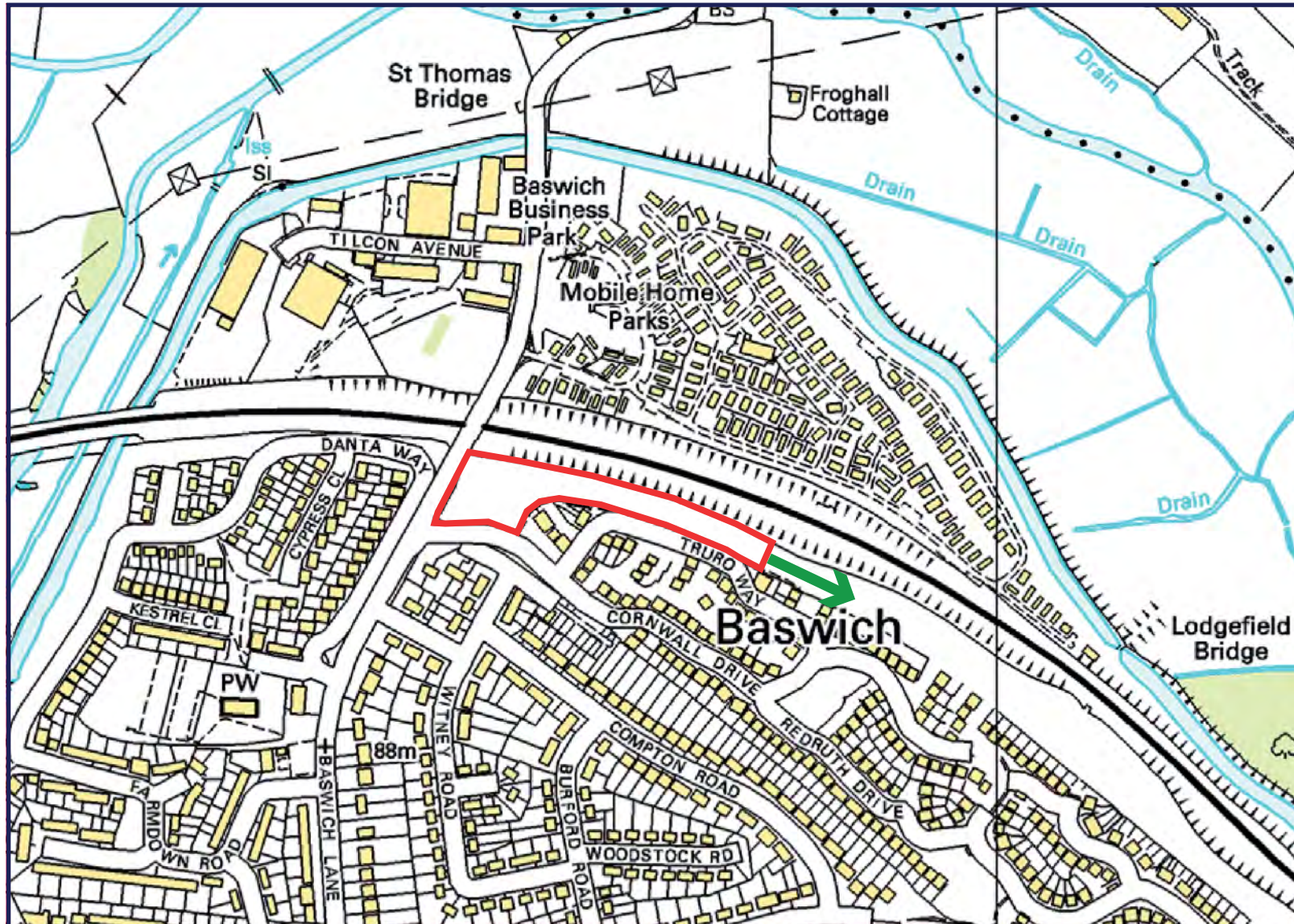
<p><b>Policy C1 – Dwelling Types and Sizes</b></p>	<p>Yes</p>	<p>Unsound – Not justified</p>	<p>of infrastructure for transport where it has been identified as being an essential requirement. Therefore, RPS considers the Plan to be unsound as safeguarding land, including the site at North Baswich, for potential future phases of the EDR route, when it is not proposed to be delivered in the Plan, during the plan period and is not justified by the evidence base, makes the Plan not effective, justified or consistent with national policy.</p> <p>Policy C1 requires developments to provide a range of dwelling types and sizes for a mixture of different households, but section a. of the policy requires the proportion based on “Existing household and dwelling sizes in the development locality”.</p> <p>Development proposals should not be based upon replicating what housing already exists in the locality. Development should be based upon identified housing need and market demand, in accordance with NPPF paragraph 50 which states “identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand”.</p>	<p>It is recommended that section a. of the policy should be deleted.</p>
<p><b>Policy C2 – Affordable Housing</b></p>	<p>Yes</p>	<p>Unsound - Not effective or justified</p>	<p>The Plan relies upon the report Economic Viability of Housing Land in Stafford Borough July 2011 by Lewel which is out of date. Paragraph 158 of the NPPF requires that Local Planning Authorities should ensure that the local plan is based on adequate, up to date and relevant evidence.</p> <p>In addition there is no evidence that the Viability Report adequately took into account the cost implications of all policies now contained in the Plan, including for example I1 Infrastructure Delivery Policy. These costs may result in making sites unviable and jeopardise housing delivery.</p> <p>The proposed provision of affordable housing through Policy C2 is not proven. It is the Council’s responsibility under Paragraph 174 of NPPF</p>	<p>It is recommended that the Plan’s affordable housing requirements should be reassessed once an up to date viability report has been undertaken.</p>

<b>Policy C7 – Open Space, Sport and Recreation</b>	Yes	Unsound - Not effective	<p>to properly assess viability.</p> <p>This policy requires new housing development to contribute to open space, sport and recreation provision to help meet the Local Standards set out in Appendix G.</p> <p>Appendix G lists a number of different open space typologies and sets standards of provision in sqm per person, however it does not make it clear how these standards will be applied to each development.</p> <p>In paragraph 11.22 of the supporting text it states that further details are to be provided through a new Open Space, Sport &amp; Recreation Supplementary Planning Document. On this basis Appendix G is unnecessary and unhelpful and should therefore be deleted and the policy should refer to the new SPD.</p>	<p>It is recommended that reference in the policy to “the Local Standards set out in Appendix G” should be amended to “the <u>Local Standards as set out in a new Open Space, Sport &amp; Recreation Supplementary Planning Document</u>”.</p> <p>It is recommended that Appendix G of the Plan which contains Local Space Standards should therefore be deleted</p>
<b>Policy N1 – Design</b>	Yes	Unsound - Not effective, justified or consistent with national policy	<p>This policy includes obligations for the use of best practice guidelines, which were designed for voluntary rather than mandatory use, for example Policy N1c - New developments will comply with Building for Life 12 principles; and Policy N11 - New developments will comply with Secured by Design principles. This is not appropriate and these references should be deleted.</p>	<p>It is recommended that sections c. and l. of the policy be deleted.</p>
<b>Policy N2 – Climate Change</b>	Yes	Unsound - Not effective, justified or consistent with national policy	<p>This policy under the sub-heading ‘Sustainable Construction’ states “All new residential development will be expected to incorporate sustainable design and construction technology to achieve a Code for Sustainable Homes star rating in line with Government policy.” Paragraph 12.17 states that new housing developments will be required to provide a Code for Sustainable Homes (CfSH) certification.</p> <p>It is inappropriate for the policy to outperform national standards by requiring CfSH certification. Under the Government’s Zero Homes</p>	<p>It is recommended that references in the policy to the requirement for residential developments to provide Code for Sustainable Homes certification should be deleted.</p>

<p><b>Policy I1 - Infrastructure Delivery Policy</b></p>	<p>Yes</p>	<p>Unsound – Not Effective, or Consistent with national policy</p>	<p>Policy only compliance with Part L of Building Regulations is mandatory, which deals with energy efficiency. This is just one component of the nine categories in the CfSH.</p> <p>RPS support the principle of contributions being secured in a variety of ways, including the CIL charging schedule, Section 106 agreements and legal agreements to ensure new developments contribute to new and/or improved infrastructure and services.</p> <p>Notwithstanding this the scale of development must not be subjected to such a scale of obligations and policy burdens to threaten deliverability. Paragraph 13.5 indicates a viability analysis is being undertaken as part of the introduction of CIL. The CIL Charging Schedule must be prepared at a level that is economically viable for development.</p> <p>A summary table of other critical infrastructure costs and available funding is provided at paragraph 13.24. This indicates a total capital cost (2011-2031) of £122.5m+, and a capital cost of £19.55m+ for the first five year period (2011-2016) of the plan. However the committed funding is stated as only being £6m and therefore there is a significant gap in terms of infrastructure funding which is in danger of making the proposed developments in the Plan unviable and therefore undeliverable.</p>	<p>Planning obligations should only be sought where they meet the tests of NPPF paragraph 204.</p> <p>It is recommended that the final sentence in Policy I1 be amended from “In assessing such requirements, the viability of developments will also be considered when determining the extent and priority of development contributions” should be amended to read “<u>In assessing such requirements, the viability of developments will be a key consideration and development contributions sought will meet the tests of NPPF paragraph 204.</u>”</p>
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# APPENDIX 1 – SITE LOCATION PLAN

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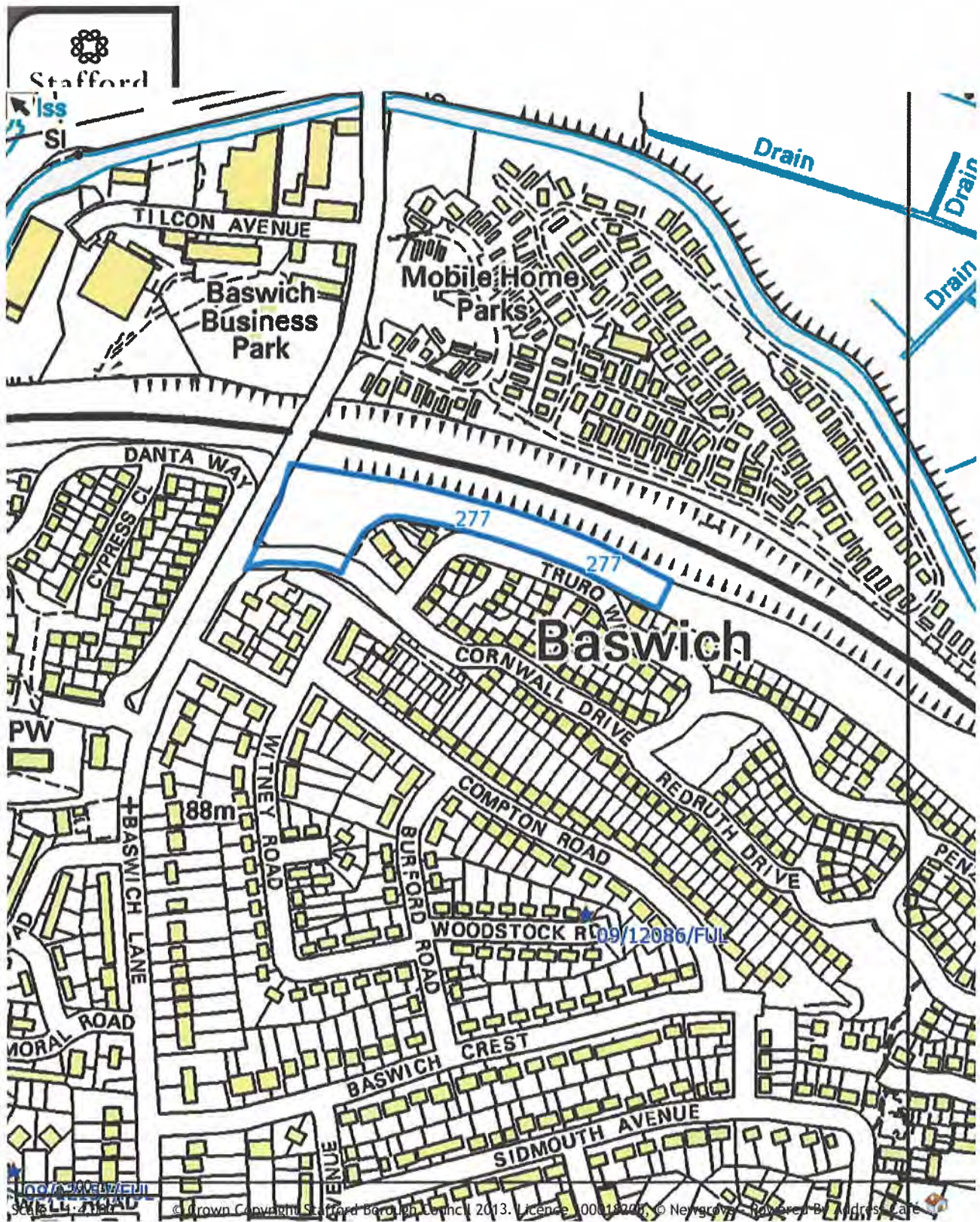
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CLIENT: Barratt West Midlands	DATE CHECKED: 20/10/11
DATE: October 2011	REVISION: 00
STATUS: Final	PREPARED BY: JP



Highfield House, 5 Ridgeway, Quinton Business Park, Birmingham, B32 1AF  
 T: 0121 213 5500 F: 0121 213 5502 W: www.rpsgroup.com/pte

**APPENDIX 2 – EXTRACT FROM 2012 SHLAA**

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## i Summary of sites

Settlement	Site ID
Cotes Heath	34a
Eccleshall	41a
Gnosall	26a, 28a, 31a
Great Haywood	53a,
Hopton	45a
Little Haywood	60a, 63a
Swynnerton	79a
Yarnfield	67a, 68a

Table i.4 Deliverable Sites identified outside Residential Development Boundaries

Settlement	Site ID
Stone	359

Table i.5 Developable Sites identified outside Residential Development Boundaries

Settlement	Site ID
Stafford	22, 23, 40, 49, 61, 71, 95, 98, 105, 153, 157, 158, 159, 173, 177, 187, 214, 217, 238, 251, 258, 276, 277, 311, 342, 336, 347, 353
Baswich	271, 272, 352
Stone	31, 37, 44, 45, 64, 73, 111, 119, 133, 156, 222, 243, 269, 285, 308, 309, 314, 320, 321, 325, 326, 335, 351, 356, 359
Eccleshall	47, 79, 80, 190, 195, 250, 264, 286, 288, 289, 290, 300, 334
Gnosall	3, 18, 24, 25, 52, 59, 116, 235, 247, 252, 341, 343, 346
Great Haywood	75, 104, 128, 174, 241, 259, 278, 315
Haughton	55, 56, 57, 58, 99, 115, 211, 244, 301, 316, 317
Hixon	17, 21, 39, 51, 92, 93, 122, 125, 137, 155, 160, 206
Little Haywood	5, 15, 36, 274
Weston	132, 284
Woodseaves	33, 107, 121, 146, 147, 148, 149, 162, 163, 205, 245, 249, 279, 345

**APPENDIX 3 – 2013 SHLAA REVIEW CORRESPONDENCE**

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Mr T Watton, RPS Planning & Development  
Highfield House  
5 Ridgeway  
Quinton Business Park  
Birmingham  
B32 1AF

CONTACT Henry Lewis  
DIRECT DIAL 01785 619537  
FAX 01785 619 473  
EMAIL [hlewis@staffordbc.gov.uk](mailto:hlewis@staffordbc.gov.uk)  
OUR REF RAY/FP/ 766.0  
YOUR REF  
DATE 28 February 2013

Dear Sir/Madam

Thank you for previously submitting a site for the Strategic Housing Land Availability Assessment (SHLAA). Although work on the 2012 SHLAA has now been completed, a review of the document will be taking place in 2013.

As part of the review of the SHLAA we need to ensure that the site is still available, deliverable and viable for development as well as having accurate and up to date information. Therefore, I have enclosed a copy of the site proforma so as to ensure that the information we have on your site is correct. Where the information is not up to date or is absent, a blank proforma can be downloaded at the following link <http://www.staffordbc.gov.uk/strategic-housing-land-availability-assessment-shlaa> and e-mailed to Stafford Borough Forward Planning Department at [forwardplanning@staffordbc.gov.uk](mailto:forwardplanning@staffordbc.gov.uk). Please could you respond confirming that your site is still available for development by Friday 15 March 2013. In doing so, this information will then be incorporated into the 2013 SHLAA.

You can read more of the context concerning the SHLAA at the following web-page link <http://www.staffordbc.gov.uk/strategic-housing-land-availability-assessment-shlaa>

If there are any other matters you wish to discuss in relation to this letter please do not hesitate to contact me on the above telephone number.

Yours faithfully

*Henry Lewis*

Henry Lewis  
Forward Planning Section

**Stafford Borough Council**

Civic Centre, Riverside, Stafford, ST16 3AQ, DX 723320, Stafford 7.  
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WEB [www.staffordbc.gov.uk](http://www.staffordbc.gov.uk)



2006-2007  
Transforming the Delivery of  
Services Through Partnerships  
2009-2010  
Raising economic prosperity  
through partnership



Site Details	
Site No. 277	
Site Location	Land at North Baswich, Stafford
Name of developer (s)/ Agent promoting the site	Barratt West Midlands & The Inglewood Investment Company
Name of Land Owner (s)	RPS palnning and Development
Site Characteristics	
Site Size	0.9ha
Surrounding Land Use (s)	Residential and Industrial
Site Suitability	
Is the site within the Residential development boundary	The site is within the RDB
Estimated Number of Houses	27 houses
Current land Uses	Greenfield/ Scrub
Greenfield/ Brownfield	Greenfield
Is there access to key Local Services and Facilities? If yes, please specify, together with approximate distances.	Library – 1.40 miles, Stafford centre, Primary School – 0.99 miles, Weston Road, Petrol Station – 2.32 miles, Stone Road (Esso garage on Lammascote about 1 mile), Secondary School – 0.32 miles, Blackheath Lane, Job Centre – 8.48 miles, Cannock (approx 2 miles to jobcentre plus Stafford), Bank – 1.52 miles, Stafford centre, Doctors – 1.34 miles, Bodmin Avenue, Post Office – 0.99 miles, Weston Road, Supermarket – 0.99 miles, Weston Road Co-op, Pub – 0.39 miles, Weston Road (The Morris Man), Community/Day Centre – Stafford day Centre 1.66 miles, Marston Road, Takeaway – 1.28 miles, Bodmin Avenue
Is the site easily accessible by public transport?	Baswich is accessible by bus route 1 hourly or more frequently during the day.
Is the site within, adjacent to, or have an impact on the Green Belt?	The site does not impact the green belt designation.
Potential for flooding	The site does not fall within the flood plain.
Does the Site impact on the Cultural/ Built Heritage? (i.e. Conservation Areas, Listed Buildings)	The site does not impact on the cultural/ built heritage.
Does the site impact on any Protected Environmental Area Designation (e.g. SSSI, AONB, SBI)?	The site does not impact on any protected environmental areas
Does the site impinge on any Areas of Landscape Value (e.g. SLA)?	The site does not impinge on any areas of landscape value.
Is the site considered to be contaminated?	The site is not considered to be contaminated
Site Availability	
Anticipated Time Scale (Estimated)	2017-2022
Is the necessary infrastructure available to facilitate development.	The necessary infrastructure is available within the locality but the provision of infrastructure to the site will need to be confirmed with the relevant utility companies.

Does the site have legal/ ownership issues	No
Other issues regarding Availability	A legal agreement has been reached to sell the land. Furthermore, the site is part of the proposed eastern by pass route and is part of HP 2 housing allocation.
<b>Site Achievability</b>	
Is there known developer interest	Yes
Is the site constrained by Financial/ Cost or other Factors?	No
Is the site considered financially viable	No
<b>Final Conclusion</b>	
Site developable in years 2017-2022	

# **APPENDIX 4 – EXTRACT FROM PLAN FOR STAFFORD BOROUGH (JAN 2013) POLICIES MAP**

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# The Plan for Stafford Borough Publication

Choose what you would like to do...

Find a location

Type an address, place, postcode or street within the council area and click the Search button.

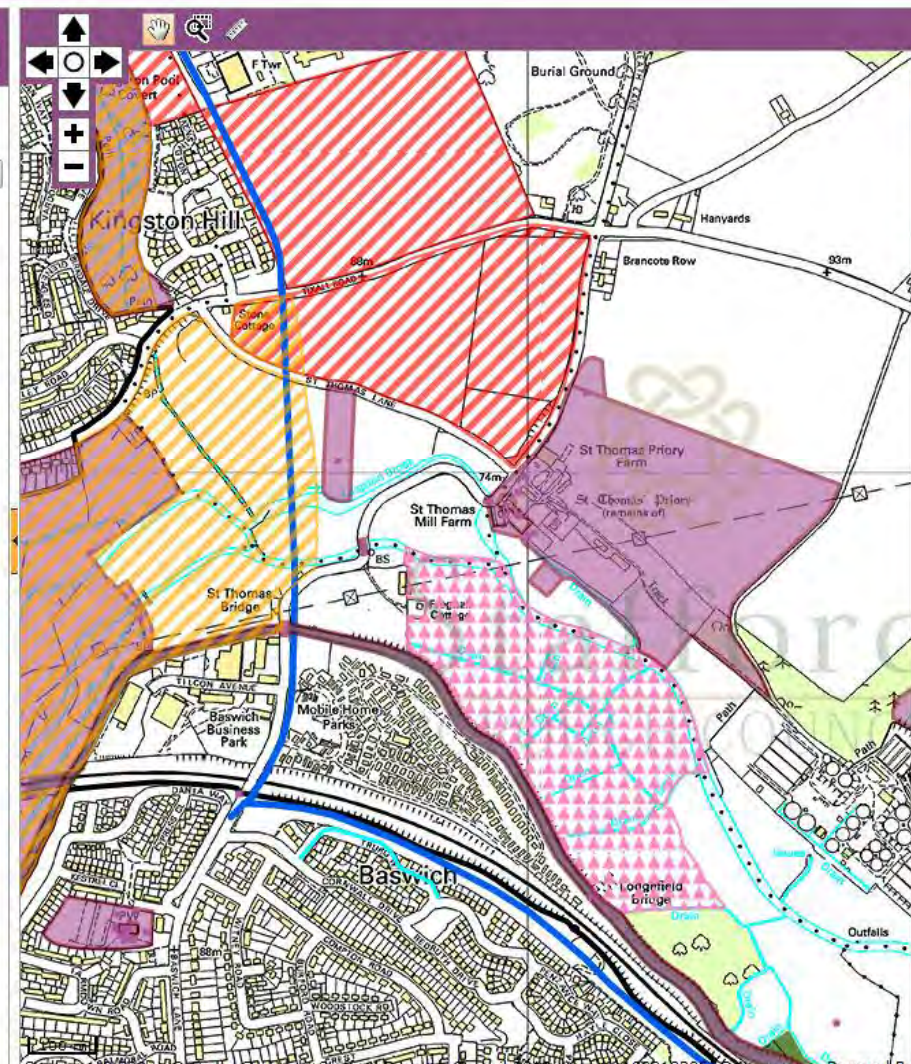
truro

1 Matching Results Found

Page : 1

Truro Way (STAFFORD)

Page : 1



Select a base layer for the map.

Ordnance Survey Maps

Click on the layer group name to see what layers are available to view on the map. Tick the boxes to turn individual layers on/off. Some layers will not be visible at certain scales.

### The Plan for Stafford Borough Publication – Policies Map

#### Boundaries

Borough Boundary

Planning Layers

Area of Outstanding Natural Beauty (AONB)

Site of Special Scientific Interest (SSSI)

Special Area of Conservation

Stafford and Stone settlement boundaries

Stafford and Stone Strategic Development Locations - Housing

Stafford and Stone Strategic Development Locations - Employment

Western Access Improvement Scheme

Eastern Distributor Road

Major Developed sites within the Greenbelt

Ladfordfields Industrial Estate

**APPENDIX 5 – EXTRACTS FROM  
TRANSPORT/INFRASTRUCTURE EVIDENCE BASE**

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Stafford Borough Council

# Stafford Borough Infrastructure Strategy

July 2009

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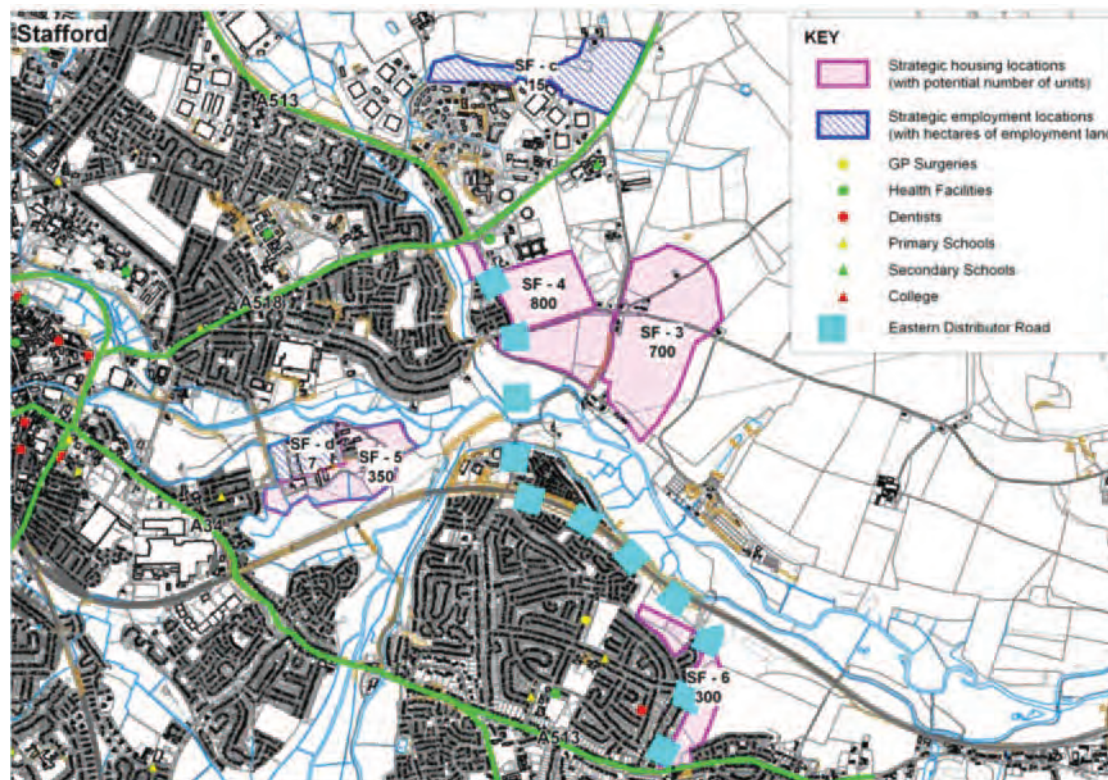
Stage 1 Final Report

TRANSPORT  
TRAFFIC  
DEVELOPMENT  
PLANNING  
URBAN DESIGN  
ECONOMICS  
MARKET RESEARCH

## 2.4 Eastern Direction of Growth

2.4.1 The potential development sites identified in the Eastern Direction of Growth are indicated in Fig.2.4 below.

Figure 2.4: Development Sites in the Eastern Direction of Growth



2.4.2 The key issues for infrastructure provision in the Eastern Direction of Growth are as follows:

- A new waste water pumping station would be needed, funded by developers. The critical issue here will be the lead time required to deliver this.
- Any significant development (over 200 units in this direction) will require investment in transport infrastructure. The LDF Core Strategy Issues and Options Paper indicates the need for an Eastern Distributor Road between the junction of Beacon Side (A513) and Weston Road (A518), and Cannock Road (A34) south of Walton on the Hill (where it would connect with the proposed Southern Distributor Road).
- All sites in the Eastern and Southern Directions of Growth are within 3km of Cannock Chase Special Area of Conservation (SAC), and their development is likely to be conditional upon demonstrating that the mitigation of potential impacts on the SAC have been fully addressed in accordance with the forthcoming Appropriate Assessment.

2.4.3 We have assessed the deliverability of this road north and south of Tixall Road.. At present, the north western section of a potential Eastern Distributor Road would meet the A513 at a roundabout at its junction with the A518. South of the roundabout there is a stub for the next section of road which currently only services a small complex of commercial buildings. If the road were built it would cross a field identified as a potential housing site (SF-4, 700 units) before reaching Tixall Road. Immediately to the west is a completed housing development with a single access onto Tixall Road. This development has a spine road allowing for expansion northwards – presumably dependent on the new

section of link road being built. There is another potential development site (SF-3, 800 units) fronting the south of Tixall Road further to the east. It is possible that at least part of this site could be delivered through access onto Tixall Rd. and through SF-4 onto the A513. This would require further detailed assessment.

2.4.4 However, south of Tixall Road (to the A34) the Eastern Distributor Road would face several difficult (if not insurmountable) challenges to implementation, including:

- significant technical difficulties in terms of alignments close to residential areas;
- the need to cross the West Coast Main Line and replace a railway bridge with the time and cost that would involve;
- the absence of any allocated funding in the current Regional Funding Allocation or Local Transport Plan;
- and the fact that developer contributions are unlikely to provide for the full cost of the road (not helped by the fact that the W S Atkins study demonstrates that an Eastern Distributor Road is not required to facilitate the achievement of the 7,000 homes target for Stafford).

Similarly we do not see any reason why SF-5 (a greenfield site with agricultural use) cannot be delivered in the absence of an Eastern Access Road provided appropriate mitigation measures are put in place. It may also be possible to deliver SF-6 (in whole or in part) securing access to the A513 via existing access roads or directly, although this will require further assessment.

2.4.5 Largely due to the strategic transport issues discussed above, we consider it best to treat the Eastern Direction of Growth as a set of discrete development opportunities (allowing for the obvious relationships between SF-3 and SF-4). In this way it may be possible to view the Eastern quadrant as a resource which can be developed as needed and potentially providing between 1,200 and 1,900 dwellings (subject to access issues for SF-3).

2.4.6 Table 2.2 below summarises the key infrastructure requirements associated with development to the east of the town.

**Table 2.2: Eastern Growth Infrastructure Requirements**

Sites	Infrastructure	Programming / Phasing	Capital Cost	Funding
SF-4- SF-5	Link Road from Roundabout at junction of A513 and A518 to SF4	In parallel	Dependent on ransom payments? (TBC)	Developer contributions
	Local electricity sub-station	In parallel	£70,000	Developer to be repaid by utility provider?
SF-3- SF-5	Green Infrastructure – flood mitigation	In parallel	Unknown	Developer contributions
SF-3, SF-4 & SF-c:	Foul flow from these sites would be pumped directly to Brancote STW via a new pumping station	3-4 years (TBC)	Not available	Developers
SF-3- SF-6	Water supply network re-inforcement	In parallel	£2.6m	Developer contributions
SF-6	Green Infrastructure – flood mitigation	In parallel	Unknown	Developer contributions
	Improvements to Radford Bank (A34) junction with Weeping Cross (A513)	In parallel	TBC	Developer contributions
	Improvements to Queensway gyratory	In parallel	TBC	Developer contributions
All	Additional secondary and primary school places. Current policy of a new primary school for 1000 additional houses would result in approx 1.5 new primary schools.	co-ordinate with rate of house building	To be determined, but current costs are approx £5m per new primary school (TBC).	Developer contributions

Note: TBC – To be confirmed.

# Staffordshire Local Transport Plan 2011



## Strategy Plan

## Managing Network Capacity

Whilst we will endeavour to make more efficient use of the existing road network rather than build new roads, we recognise that there will continue to be requests for additional highway capacity. The provision of additional capacity will be considered if other measures, such as promoting travel by smarter travel modes, are found to be insufficient (see Box 1.11).

### Box 1.11: Stafford Growth Point

The previous Government agreed with the relevant local authorities that Stafford should be seen as a 'Growth Point', with plans for significant investment in employment, retail and housing within the town. Despite the revocation of the Regional Spatial Strategy by the current coalition Government, the County Council and Stafford Borough Council remain committed to growth in the town. A SATURN traffic model<sup>16</sup> has been used to assess the impact of traffic that will be generated by the planned growth up to 2026, which is in line with Stafford Borough Council's Local Development Framework time period.

The assessment revealed that without the provision of additional highway capacity, as part of a wider sustainable transport strategy, the forecast travel demand associated with the town's predicted growth will lead to congestion, especially during weekday peak periods along routes within the west of Stafford and the town centre. In order to mitigate this, we are planning a range of sustainable transport measures, together with the construction of a new road. The road will connect the A518 Newport Road to the A34 Foregate Street via Doxey Road. It will provide the means by which bus services could access new development proposals at Castlefields and Burleyfields, it will increase accessibility for cyclists and pedestrians, and it will improve access (by all modes) to the town's rail station. Despite the Government's recent decision not to fund the proposed road within the current spending review period, we continue to support the scheme and are considering alternative funding opportunities to secure its delivery.

### Policy 1.6:

**We will make best use of our roads to increase capacity before considering building new roads.**

New road building will be considered where it:

- Facilitates new development/regeneration.
- Increases capacity at specific congested locations.
- Improves local safety.
- Enhances conditions for local residents, pedestrians, cyclists, public transport users and businesses.
- Takes traffic away from sensitive environmental locations.

## Keeping the Highway in Good State of Repair

Staffordshire's highway network and the wider public realm are fundamental to the economic, social and environmental well-being of the county, helping to shape the character and quality of local areas. It is essential that our largest and most visible asset, which is used daily by the majority of residents, is kept in a good state of repair.

### Policy 1.7:

**We will keep the highway in a good state of repair whilst achieving value for money.**

This will be achieved through policies contained in Chapter 2 'Maintaining the Highway Network'.

## Improving the Efficiency of Freight Distribution

The movement of goods across and within the county is vital for Staffordshire's economy to prosper. On local roads, freight accounts for between 5% and 10% of all traffic and is the second largest user by mode, behind private motor cars. Between 2006 and 2008, 214,000,000t of freight either originated or was destined for Staffordshire<sup>17</sup>. Given the volume of freight movement in the county, attempting to improve operations will have benefits for business (in terms of efficiency savings) and residents (in terms of quality of life).

# Draft Stafford Borough Integrated Transport Strategy 2011 - 2026



November 2011

- Any issues of delay and journey time reliability along a route relate to the capacity of junctions. The only length of road in Stafford that is at capacity, regardless of delays at junctions, is Radford Bank.
- Serious delays on the M6 occurred on 10 days throughout the year. These delays are likely to have resulted in a significant impact of traffic levels on local roads in Stafford.

With regard to public transport, Stafford rail station provides frequent strategic rail services and Stone station is served by less frequent Crewe to London services. The Borough is also served by a core bus network of inter-urban and local routes, supported by community transport. Community Link Stafford and District operate a dial a ride service and two smaller scale voluntary car schemes operate for local residents in Gnosall and Colwich, including Little and Great Haywood. According to Census data, around 70% travel to work by car, which is higher than the national average, and 5% by public transport.

The Local Development Framework (LDF) Draft Core Strategy is currently scheduled for publication by Stafford Borough Council at the end of 2011. The Borough Council has confirmed that Stafford has retained its status as a Growth Point and is likely to accommodate significant levels of development in the coming years through a balanced supply of new employment and housing provision. It is currently expected that around 500 new homes per year will be delivered through to 2031, with the majority being in Stafford, and a large proportion of these on greenfield sites. The remainder will be built in Stone with a small proportion in the rural areas. Housing growth will be supported by retail growth and 8 hectares of new employment land per year.

A Stafford (urban) Transport Study is being produced as evidence to support the LDF. The study compares land use options in overall transport terms and includes traffic modelling to assess the strategic impact of likely development traffic. The assessment concludes that the most efficient way to increase households and jobs in Stafford is to focus the majority of greenfield development in the west and the north of the town, and a smaller proportion in the east. An alternative strategy would be to allocate a far higher proportion of housing growth to the east of Stafford. However this would require the provision of the Stafford Eastern Bypass which is a far more expensive and environmentally damaging solution, and based upon the evidence from highway modelling, increased levels of congestion would result. The Meaford Power Station site to the north of Stone and Blythe Bridge regeneration site are also significant employment land proposals in the Borough.

A broadening of the economic structure of Stafford town centre is required to support economic and retail growth together with the development of enabling infrastructure including the Stafford Western Access Improvements. Projects that will regenerate the town centre include new County Council offices, residential development, enhanced retail, leisure and further education facilities, and car parking provision.

### **Transport Achievements:**

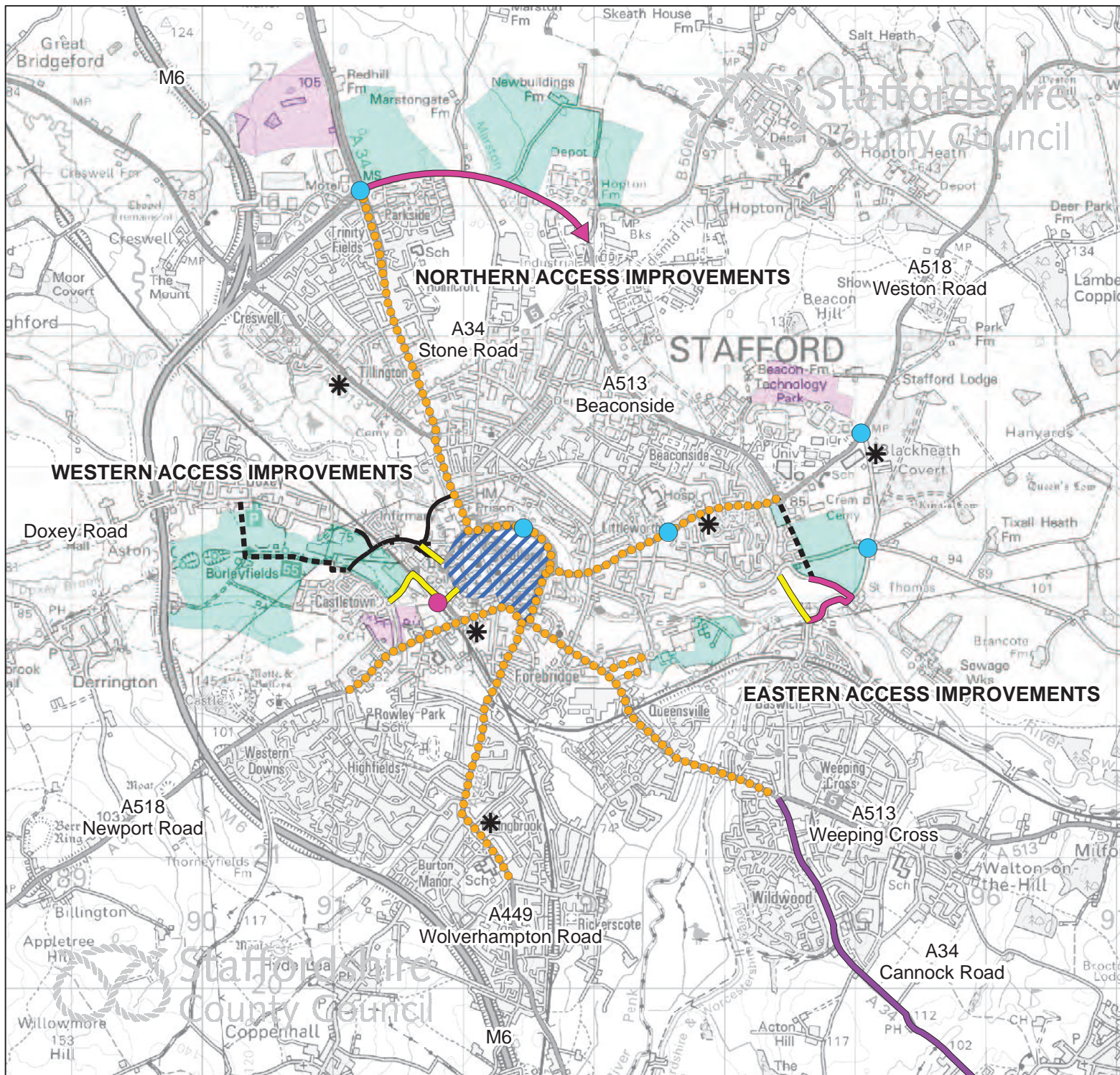
The Stafford Urban Area Transport Management Strategy (SUATMS) has been implemented during the period 2002 to 2011. Schemes totalling around £5m have been delivered through public funding and developer contributions of £1.4m. They include:













- Bus stop upgrades throughout the urban area and improved bus access to the hospital
- Rail station forecourt and access improvements
- Pedestrian crossing facilities and enhanced footways to the town and University
- Cycle routes between residential areas and the town centre and cycle parking



DRAFT

Stafford Transport Strategy



-  Potential Residential Development
-  Potential Employment Development
-  **Town Centre Local Transport Package**  
Pedestrian Priority, Traffic Management, Enhanced Passenger Information, Car Park Review
-  Rail Access Improvements
-  Junction Improvements
-  School Time 20mph Zones
-  New Potential Access Road
-  Stafford Western Access Route
-  Traffic Management
-  Speed Limit Reduction
-  Cycle / Walking Routes
-  Potential Highway Capacity Improvements

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NOT TO SCALE



# Stafford Borough Infrastructure Strategy


## Stage 2

### Infrastructure Delivery Plan

Final Report

Project Number VN16348 | July 2012

In association with

Hewdon Consulting 



**Mott MacDonald**

**SKM** COLIN  
BUCHANAN

- 4.1.14 Improvements to the A34 junction and the initial section of Beaconside to access the proposed employment development at Beaconside are already planned and the funding secured, or expected to be secured, from the County Council development at Redhill and adjacent committed residential proposals. Any further A34 junction improvements will require third party land, and are thus currently considered undeliverable. Therefore the improved junction will act as a throttle to traffic, and require a more robust approach to traffic demand management measures.
- 4.1.15 The Redhill development will also provide a Park & Ride facility and existing bus services will be re-routed to serve the site. All development will be required to provide initial funding for new or enhanced bus routes to service their developments for an agreed period, normally 5 years, through a s106 agreement. At such time, the services should be commercially viable. Similarly new development will provide the necessary cycle and walking links to connect to the existing and proposed Borough-wide, and national, cycle and walking routes to the town centre and other key destinations. Any further improvements to the walking and cycling infrastructure outside of the proposed development's boundary will need to be funded through a combination of S106 contributions and other funding sources. The key national cycle network enhancements are identified in the Draft Integrated Transport Strategy for Stafford.

#### ***Stafford Eastern Access Improvements***

- 4.1.16 Improvements required to the A513 Beaconside Road / A518 Weston Road roundabout will be delivered through s106 / s278 agreements with the developer of the parcel between Weston Road and Tixall Road, providing the principal access into the development site.
- 4.1.17 Further transport infrastructure interventions have been identified to support the Strategic Development Location to the East, although none are considered essential to bring the development forward. These include the following:
- Potential capacity and safety improvements to Baswich Lane over the River Sow between St Thomas Lane and The Saltings;
  - A new cycle / walking link proposed over the River Sow between Baswich Lane and Tixhall Road;
  - Potential Park and Ride scheme at Beacon Business Park.
- 4.1.18 All the above will need to be funded through a combination of SCC funding and developer contributions. An application has been made to the Local Sustainable Transport Fund for the cycling and walking link over the River Sow.

#### ***Stafford Western Access Improvements***

- 4.1.19 Significant technical work has also been completed for development west of Stafford, as part of a Major Scheme Business Case produced in 2010 regarding the Stafford Western Access Improvements. The package of measures includes the Stafford Western Access Route and associated sustainable transport and traffic management measures. Funding was not secured from the Department for Transport (DfT), following abolition of the Regional Funding Allocations process. SCC is therefore revising the proposals and the improvements will be delivered through

POLICY	AREA	ITEM	DESCRIPTION	STATUS	FUNDING	COST	LEAD	PARTNERS	DELIVERY NOTES	TIMEFRAME	5YR	10YR	15YR
Core Policy 6	East of Stafford	Support delivery of the Eastern Access Improvement Scheme and associated transport improvements from Weston Road to St Thomas' Lane	Access Road between Weston Road and St Thomas Lane	Planned	Developer s106/S278 agreement	£3.5 million	Developer	SCC	A short section of this could be delivered by new development between the Weston Road (A518) and St Thomas' Lane.	In parallel with development	Y		
			Baswich Walking and Cycling Link	Proposed	LTSF Bid submitted February 2012	£1.3m	SCC	SBC			Y		
			Baswich Lane Capacity Improvements	Proposed	ITS Funding/CIL	£4 million (TBC)	SCC	SBC	Baswich Road crossing floodplain areas, the River Sow and the canal			Y	
			New junction on Weston Road	Planned	S278 agreement with Beacon Technology Park	Committed							
			A513/A518 Junction Improvements	Proposed	Developer s278 (Beaconside Business Park)	Committed							
Stafford Town Centre LTP	Traffic Management Schemes	A34 Stone road incl A34 Bus Priority		Planned	LTP/Developer contributions (s106/CIL)	TBC	Stafford Borough Council		From April 2014, all developer contributions available to deliver this strategy could be collected by the Borough Council via a Community Infrastructure Levy(CIL). The level of CIL likely to be made available for transport will be influenced by the approved LDF Infrastructure Delivery Plan, informed by this strategy. Direct access to developments will still be funded by S278 and S106 agreements	Y	Y	Y	
			A518 Weston Road	Planned	LTP/Developer contributions (s106/CIL)	TBC	Stafford Borough Council						
			A513 Lichfield Road	Planned	LTP/Developer contributions (s106/CIL)	TBC	Stafford Borough Council						
			A449 Wolverhampton Rd Urban Route Strategy	Planned	LTP/Developer contributions (s106/CIL)	TBC	Stafford Borough Council						
			A518 Newport Road	Planned	LTP/Developer contributions (s106/CIL)	TBC	Stafford Borough Council						
			Review of traffic management and car parking following occupation of Tipping Street offices and progress on other developments	Planned	LTP/Developer contributions (s106/CIL)	TBC	Stafford Borough Council						
			Extension of Urban Traffic Control	Planned	LTP/Developer contributions (s106/CIL)	TBC	Stafford Borough Council						
			Traffic management and sustainable transport provision in Stone to accommodate future development	Planned	LTP/Developer contributions (s106/CIL)	TBC	Stafford Borough Council						
			Junction Improvement A518 Weston	Committed	Developer S278 agreement	TBC							



**The Plan for Stafford Borough  
Pre-Submission Consultation**

Ref:

**Representations Form**

**(For official  
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- or by fax to: 01785 619473

**Responses must be received by 12 noon on Thursday 28<sup>th</sup> February 2013**

**This form has two parts:**

**Part A:** Personal Details

**Part B:** Your representations.

- Please complete Part B of this form for each representation you wish to make. You do not need to complete Part A more than once, but please ensure you state your name or organisation as applicable at the top of each Part B form you submit.
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# 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	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

Name or Organisation	Wardell Armstrong LLP on behalf of Hallam Land Management Limited
----------------------	---

### 3. What part of The Plan for Stafford Borough (including the Policies Maps document) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	Policy I - Stafford Town
---	--------------------------

If your comment does not relate to a specific part of the document, or it relates to a different document, for example the Sustainability Appraisal, please make this clear in your response.

### 4. Do you consider that the Plan for Stafford Borough is:

- a. **Legally compliant\*?**  
Yes  No
- b. **Sound\*?**  
Yes  No

To check a box when completing this form electronically, double click on it and select 'checked' under default value.

\*Please refer to the attached note for guidance on legal requirements and soundness.

If you have entered **No** to Q4.b. please continue to Q5. In all other circumstances please go to Q6.

### 5. Do you consider The Plan for Stafford Borough is unsound because it is not:

- a. **Positively Prepared**
- b. **Justified**
- c. **Effective**
- d. **Consistent with national policy**

### 6. Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.

The Plan in relation to Stafford Town demonstrates an overriding emphasis on delivering predominant growth (72%) in the main settlement. This is supported, and should be without restriction related to the former Residential Development Boundary (RDB) as there is now significant precedent for housing development outside the RDB, as ratified in Appeal Decision ref. APP/Y.3425/A/12/2172968

(attach separate sheets as necessary)

- 7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough legally compliant or sound, having regard to the test you have identified at question 5. You will need to say why this change will make the document legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

LAND OFF WOOTTON DRIVE - STAFFORD.

The plan promotes at Policy Stafford I - Stafford Town, that it performs the major role on delivering the fundamental growth aspirations and benefits intended by the Plan, and as such it provides guidance for new development.

This principle is supported, and the Stafford Town Key Diagram setting out the spatial strategy is generally accepted. It should however be made totally clear there should not be any relative boundary to development, as was the case with the current Local Plan Residential Development Boundary (RBD) to the western edge of the settlement of Stafford where this affects land still owned by HLM.

The land denoted on the attached SHLAA Plan, has remained unadopted since the residential development by Henry Boot in the 1980's and is currently utilised by the public with HLM permission.

There are issues with the maintenance of the land. To secure a certain future for the site including its maintenance and formalisation of elements of public open space, with appropriate capital funding needs, the site needs to be accepted in principle for a complimentary level of development. The site is part of the whole development as that receiving planning permission, is accepted as such, and is sensible and logical inclusion. This key step toward securing the future of the site whilst it is under appropriate ownership and control.

The RBD Policy in the 2001 Borough Local Plan and saved in 2007 had 'the prime purpose of limiting development in open countryside' and 'serves to define predominantly residential areas'. There is now total sense and logic to acceptance of this land for development in that it would not prejudice any acknowledged interests in particular those set out in the Policy section 3.4 of the saved policy. To the contrary acceptance of the site is required to properly formalise future interest, proposals and a secured managed future.

The site is perfectly well suited for housing development because it is directly connected to the settlement and well related to existing community facilities and services.

(attach separate sheets as necessary)

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- a. **Yes** I wish to participate at the Examination in Public
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(attach separate sheets as necessary)

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**Please ensure you have printed your name or organisation at the top of this form**



Choose what you would like to do...

Search for Housing Assessment sites

Search for Housing Assessment sites at a location by using one of these tools to draw on the map:



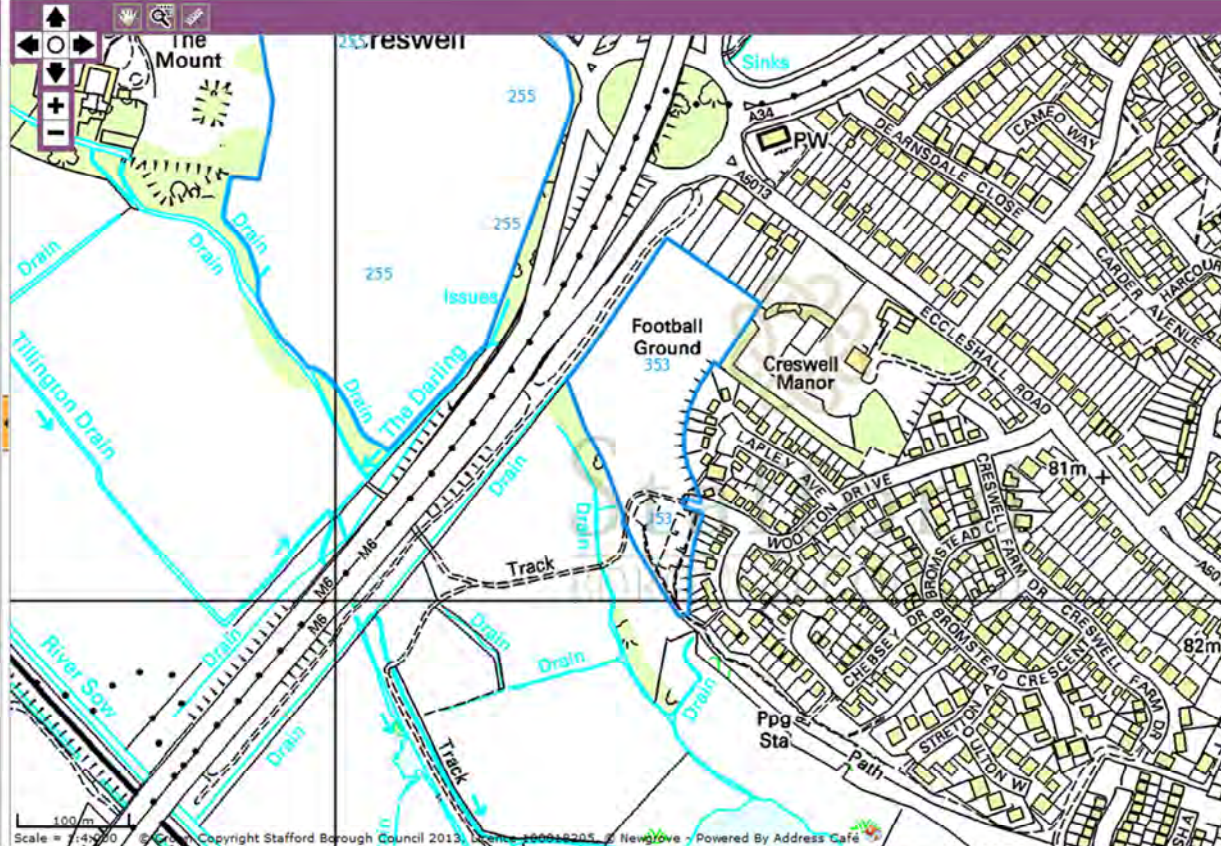
1 Results Found

[Clear Results](#) | [Download Results](#)

Page: 1

**Site No:** 353  
**Site Location:** Land off Wootton Drive, Stafford  
**Total Site Area:** 2.69  
**Date Of Receipt:** 2011/10/20  
**Agent:** Hallam Land Management Ltd (HLM)  
**Agent Address:**  
**Representee:**  
**Representee Address:**  
**Requested Use:**  
**Preferred use:**  
**Constraints:**  
**Ward:** Tillington Ward  
**Zoom:** (not currently deliverable)

Page: 1



Hide Legend

Ordnance Survey Maps

Click on the layer group name to see what layers are available to view on the map. Tick the boxes to turn individual layers on/off. Some layers will not be visible at certain scales.

**SHLAA 2012 Update (Strategic Housing Land Availability Assessment)**

Sites Not Currently in the Planning Process

Process

- Sites Requested For Inclusion
- Potential Sites within Residential Development Boundaries

Sites in the Planning Process

- Current Housing Commitments
- Outstanding Local Plan Housing Allocations

Borough Boundary

100%



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# 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)	Baden Hall Enterprises and JT & DC Goucher	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

Name or Organisation	Baden Hall Enterprises and JT & DC Goucher
----------------------	--

### 3. What part of The Plan for Stafford Borough (including the Policies Maps document) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	SP3 SP4 SP6 (ref. 6.6) SP7
---	-------------------------------------

If your comment does not relate to a specific part of the document, or it relates to a different document, for example the Sustainability Appraisal, please make this clear in your response.

### 4. Do you consider that the Plan for Stafford Borough is:

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Yes  No
- b. **Sound\*?**  
Yes  No

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- c. **Effective**
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- Lack of justified and robust evidence base to support deliverability.
- Lack of flexibility.
- Robustness of delivery strategy for development.

(attach separate sheets as necessary)

7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough legally compliant or sound, having regard to the test you have identified at question 5. You will need to say why this change will make the document legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

#### **FORMER MOD LAND AT COLDMEECE, ECCLESHALL.**

Wardell Armstrong has been making appropriate representations at each relevant stage of Plan making, as set out in the Plan 1.6 'Preparation of the Plan'.

The site has been promoted as SHLAA site reference 257. Copy submission is attached for clarification.

The clear intention is to take forward the development of the site for sustainable mixed-use through promotion as an appropriate site in the Site Allocations DPD and within the Eccleshall Parish Neighbourhood Plan, in conjunction with other adjoining parishes.

These representations are made in the context of

- the NPPF which promotes flexibility in Local Plans
- the NPPF (Para 173 primarily) relating to viability and costs in plan making and decision making, with reference to 'a willing land owner and willing developer to enable the development to be deliverable'
- Policy SP4 which arbitrarily defines annual targets for the distribution of housing development without a robust evidence base
- A Development Strategy (Section 6) that is unclear in the context of flexibility to deliver sustainable development opportunities
- Policy SP7, which promotes maximisation of use of brownfield development sites (within the Borough's towns and villages) to reduce the need for development on Greenfield sites
- Para 6.6 which recognises the Neighbourhood Planning, Site allocations and site-specific policies future intentions

#### **The Developer**

The site promoter has agreed in principle that the development will be brought forward by a joint venture between two specialist sustainable housing developers, Hab Housing and Czero. Hab and Czero share a vision of developing sustainable houses and communities which go far beyond current regulations. Hab have a strong design philosophy, working with brilliant architects and landscape architects to make places that look great and work well. Czero has strong technical delivery capabilities and an unparalleled understanding of how to deliver energy efficient housing cost effectively. For example, the scheme at The Triangle Swindon received several design awards and received an RIBA Sustainability Award.

#### **Potential development models**

Hab Czero is unconstrained by the typical housebuilder development model which pays lip service to community consultation and which delivers identikit developments devoid of local context. The business was established in the belief that there has to be a better way of building houses and delivering communities.

Hab Czero would be looking to bring the site forward with the support of the local parishes and communities, and would engage with those communities from the very start of the process. This would

very much be a new community planned in partnership with current residents of the area. Hab Czero's approach is not confrontational – it is a fresh innovative approach to development.

### **Delivering a small community in a unique place**

The site provides an opportunity to develop a sustainable community in a unique place. The developers intend to make the most of the combination of natural features such as the woods and watercourses, and the man-made remnants of the firing ranges including the long straight driveways (one of which is a mile long), bunds, the concrete bunkers and other structures, and the disused former station which brought workers to the site.

Hab Czero believes that high-quality landscaping and public spaces are absolutely vital to the creation of successful communities. Hab Czero will work closely with architects and landscape architects to ensure that architecture and landscape are seamlessly linked. The aim is to create a setting that: is as natural as possible; respects and builds on the biodiversity of the site and that supports a wide range of activity including relaxation, socializing, food-growing and play.

While the exact number of houses the site will support is not yet known, the developer sees a broad range of property types. They are committed to creating mixed communities that provide both market housing and affordable homes for local people and ensures that the same high standards of design and construction are applied across the scheme. The form of the land naturally lends itself to the establishment of linked neighbourhoods each with a distinctive feel and character, separated by natural characteristics of the land.

### **Renewables**

The developer's aspiration will be to make the new community as self-sufficient as possible, particularly from the perspective of energy use. Hab Czero adopts the global "One Planet Living" initiative, which introduces 10 principles of sustainability including waste, travel, food, health and happiness. A sustainable development at Cold Meece will seek to minimise its impact on local services.

With a range of natural resources on the site, there will be a number of options for generating power from renewables, and with highly energy efficient buildings the expectation would be for power generation to exceed demand. The exact technologies to be used will be decided when a full assessment of the site's potential has been made.

### **Representation**

The site promoter wishes to make representations at this stage on the basis of requesting supportive policy to achieve sustainable high quality mixed-use development. There are strong concerns over the proposed delivery strategy for Stafford Borough which it is felt should offer greater flexibility and have a stronger and more effective evidence base to support a robust delivery strategy.

As an example, related to policies SP3 and 4 the sustainable settlement hierarchy, there is no evidence to demonstrate this reflects market-led demand. This will reduce housing delivery, which is an acute matter as recently highlighted by the Inspector in an appeal decision (APP/Y.3425/A/12/2172968) made in December 2012 which states 'there is persistent under delivery of housing (in five of the last six years) as set out in paragraph 47 of the NPPF'.

The site promoted is definitely brown field and previously developed through military usage and therefore meets one of the core planning principles set out in paragraph 17 of the NPPF as it is not of high environmental value. It is considered that there should be sufficient Plan flexibility and a more accurate policy to reflect this than Policy SP7.

The principle proposed is to achieve high quality sustainable development that will

- Deliver demonstrable benefits to the area
- Provide substantial green infrastructure
- Re-enforce less sustainable villages
- Strengthen Eccleshall as a main service centre
- Integrate with well-located surrounding rural employment sites
- Take pressure off releasing more sensitive green field sites from development
- Will deliver the concept of live-work
- Deliver community-led development

The principle aim of this promoted development is to achieve an appropriate supportive policy framework within the Local Plan to support delivery of an innovative form of development that in this instance will 'repair' a despoiled but interesting environment in a strategically important place. The promoter and the developer are committed to taking proposals forward as an exemplar of sustainable development, including the key axioms of sustainable consumption; climate change and energy; natural resources and sustainable communities.

(attach separate sheets as necessary)

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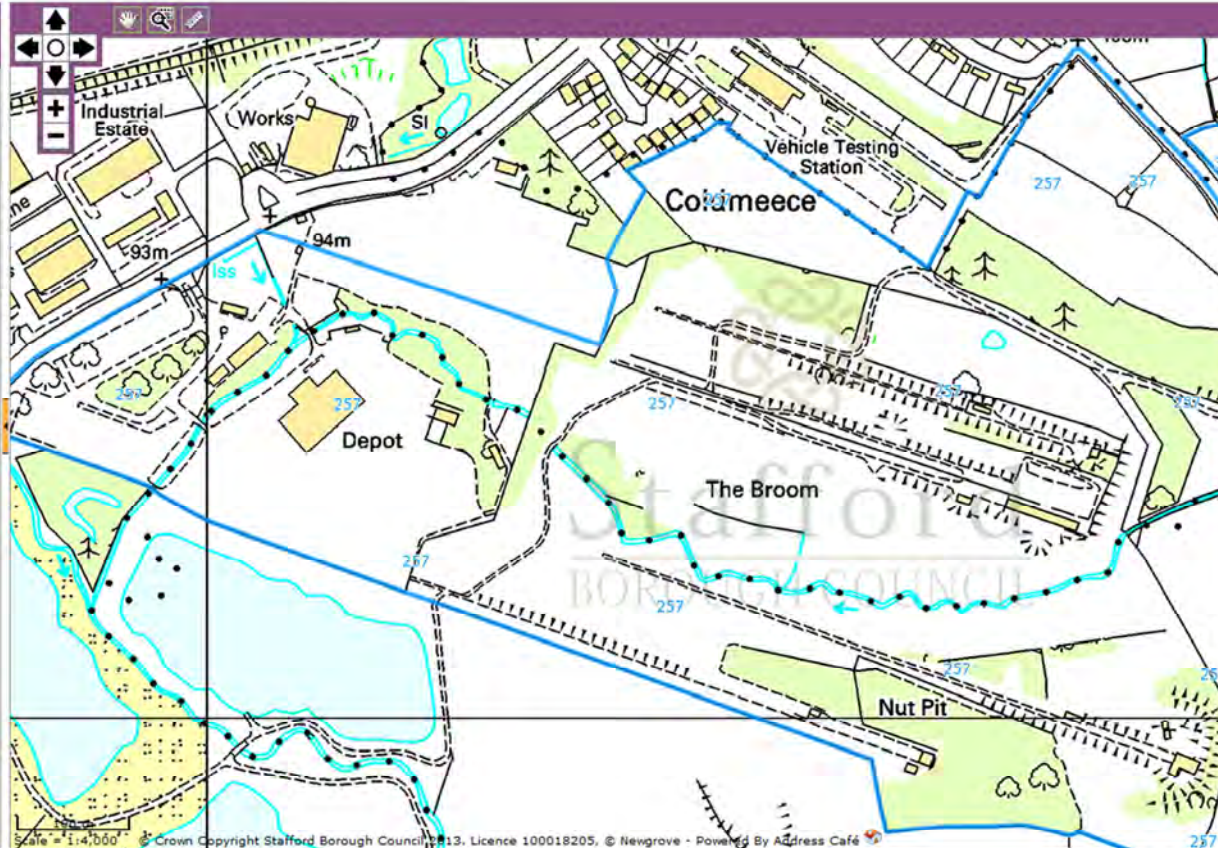


1 Results Found  
[Clear Results](#) | [Download Results](#)

Page: 1

**Site No:** 257  
**Site Location:** Land At Coldmeece  
**Total Site Area:** 49.0ha  
**Date Of Receipt:** 2008/11/17  
**Agent:** S M Stoney Wardell Armstrong  
**Agent Address:** Wardell Armstrong LLP, Sir Henry Doulton House, Forge Lane, Stoke  
**Representee:** Baden Hall Enterprises and JT & DC Goucher  
**Representee Address:**  
**Requested Use:** Housing And Employment  
**Preferred use:**  
**Constraints:** Outside RDB Boundary, In A Flood Risk Zone, Adj To Green Belt and SMR Record,  
**Ward:** Swynnerton Ward  
[Zoom](#) (not currently deliverable)

Page: 1



Hide Legend

Ordnance Survey Maps

Click on the layer group name to see what layers are available to view on the map. Tick the boxes to turn individual layers on/off. Some layers will not be visible at certain scales.

**SHLAA 2012 Update (Strategic Housing Land Availability Assessment)**

- Sites Not Currently in the Planning Process
  - Sites Requested For Inclusion
  - Potential Sites within Residential Development Boundaries
- Sites in the Planning Process
  - Current Housing Commitments
  - Outstanding Local Plan Housing Allocations
- Borough Boundary



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## 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
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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

Name or Organisation	Wardell Armstrong LLP on behalf of Hallam Land Management Limited and The Davidsons Group
----------------------	---

**3. What part of The Plan for Stafford Borough (including the Policies Maps document) does your comment relate to?**

e.g. Policy Reference, Paragraph, Map title	Policy Stone 2 - West & South of Stone Proposed Development 8.24 Stone Town Key Diagram, Development Plan and Concept diagram
---	---

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**4. Do you consider that the Plan for Stafford Borough is:**

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Yes  No
- b. **Sound\*?**  
Yes  No

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The Development Partners unequivocally support the promotion of the site identified in Policy Stone 2 - West & South of Stone 'for the delivery of approximately 500 homes'. It respects the key requirements set out with the Policy, but must contest the proposal to 'restrict delivery until after 2021' (Para 8.24) on the grounds of clear conflict with Government policy 'Planning for Growth' 2011 and the National Planning Policy Framework.

With reference to the Plan's identification of Strategic Development location Housing (P.71) and the Stone Concept Diagram (P.72), this submission includes illustrative material to support the proposition that the most effective delivery site is that shown on the proposed Masterplan. This is in fact in

- 7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough legally compliant or sound, having regard to the test you have identified at question 5. You will need to say why this change will make the document legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

**Site at Walton Hill House, Walton, Stone.**

These representations relate to previous representations to the staged progression of the Plan, as set out at 1.6, and the SHLAA submissions ref. 31 (see attached plan).

The development partners are continuing a consistent theme of promoting the site under our control and without undue impediment for the delivery of up to 500 houses, including appropriate affordable housing and a mix of housing types, tenures and styles.

The development partners offer unequivocal support the delivery of the housing element contained in Policy Stone 2 – West & South of Stone. The approach has been consistently to support the ‘Plan led’ process through promotion of the site and supporting information to support certainty of delivery. The site has been an allocation in previous draft Plans that have been the subject of consultation.

The development partners are totally committed to delivering the development of the outline form and phasing promoted. In November consultation was undertaken with the Council over a draft Statement of Common Ground setting out areas of agreement on principle, housing, environment, transport, infrastructure, future planning and delivery commitments. The main areas of disagreement which the development partners have sought further discussion with the Council are the matters of the delivery timescale and the scale of development and associated greenspace.

It is contended there is no reasonable justification to arbitrarily restrict that ‘the housing (and employment areas within the SDL will not be delivered until after 2021’. This is not reflected in up to date Governmental planning housing policy.

The site has been extensively surveyed in order to assess relative suitability, sensitivities and appropriate mitigation. This has demonstrably provided a robust evidence base to show the site is suitable for development, which has been shared with the Council. Through careful site analysis including landscape and visual assessment, ecology and nature conservation, arboriculture assessment, archaeology, ground conditions, hydrogeology and flood risk, emissions and noise, green infrastructure assessment and a transport assessment; a draft master plan, phasing plan and development framework have been produced (copies attached). Working with the highway authority, an access, transport and access strategy has been devised that maximises sustainable travel principles and connectivity.

The evidence base is developed to such an extent that it is adequate to support an outline planning application with certain matters for full agreement.

The master plan and delivery framework clearly illustrate that the most appropriate form of sensitive development form is that of approximately 18 hectares of built form and 16 hectares of green space (including community park, formal recreation, play and new landscape features). This appropriately corresponds with the area denoted on the Stone Town Key Diagram (page 66).

As an overall principle the development partners promote that the above matters of discrepancy are further discussed and appropriately dealt with as far as possible before the Plan's examination.

(attach separate sheets as necessary)

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**Please ensure you have printed your name or organisation at the top of this form**



**NOTES**

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**KEY**

- Site boundary (33.17ha)
- Proposed residential development area (15.80ha)  
450 dwellings @ 28/ha average
- Proposed footpath / cycleway connections  
(as 'A Green Infrastructure Strategy for Stafford' (Nov 2009))
- Proposed Green Infrastructure (17.37ha)
- Structural woodland planting
- Existing watercourse / drainage route retained
- Indicative attenuation
- Retained trees, woodland and hedgerows  
(Blue outline denotes Tree Protection Area, refer to FPCR Tree Survey)
- Trees recommended for removal in the interest of good management  
(refer to FPCR Tree Survey)
- Trees and hedgerows to be removed to facilitate the development

rev	date	description	by
D	18.04.2012	amendment to footpath connections	SLS
C	14.03.2012	minor tweak to layout	SLS
B	09.03.2012	Minor amendments to layout	SLS
A	17.02.2012	Revised to accommodate drainage & access proposals	SLS
-	30.01.2012	First issue.	SLS

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■ Derby DE74 2RH

t: 01509 672772  
 f: 01509 674565  
 e: mail@fpcr.co.uk  
 w: www.fpcr.co.uk

client  
**Hallam Land Management Ltd**

project  
**Walton Hill House Farm  
Stone**

drawing title  
**DEVELOPMENT FRAMEWORK PLAN**

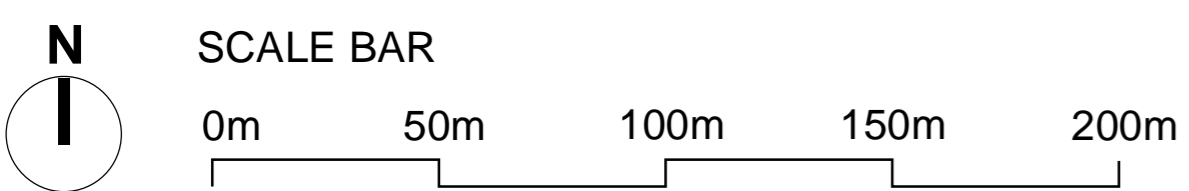
scale  
NOT TO SCALE @ A3

drawn  
SLS

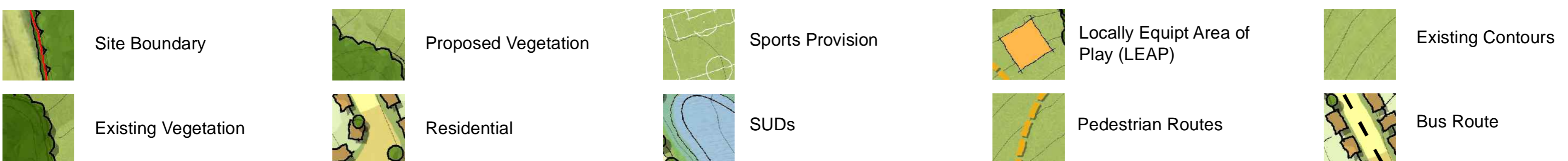
date  
April 2012

drawing number  
**4305-P-02**

rev  
**D**



**KEY**



J:\4305\LANDSCAPE\4305-L-01.indd

Hallam Land Management Ltd.  
 Walton Hill House Farm  
 Stone

**ILLUSTRATIVE MASTERPLAN**

Not to Scale @ A1

May 2012

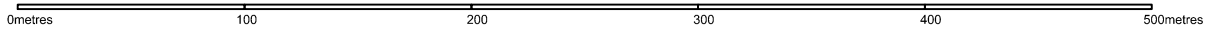
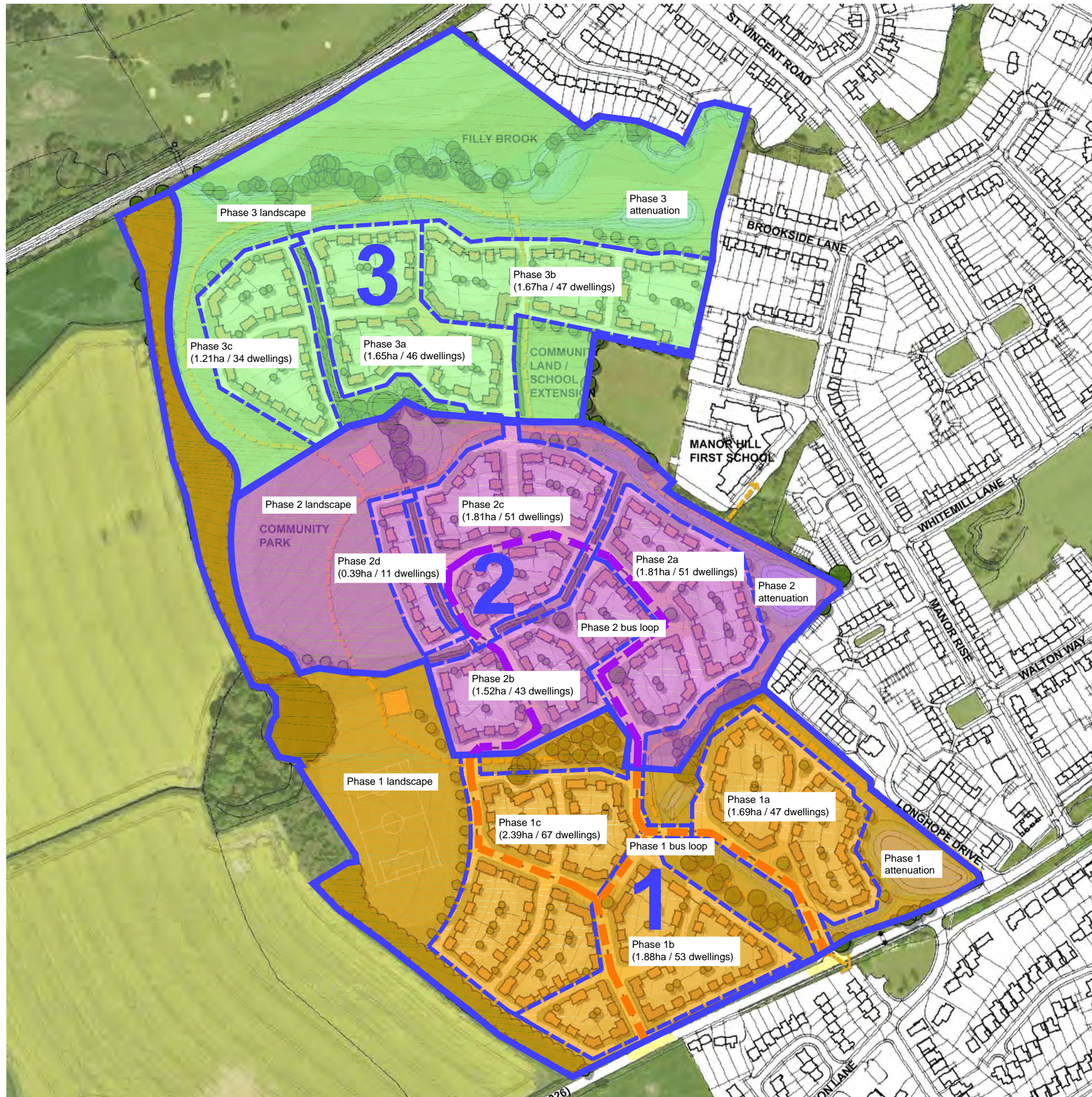
**4305-P-03** rev B

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rev	date	description	by
-	21.06.2012	First issue.	SLS

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 e: mail@fpcr.co.uk  
 w: www.fpcr.co.uk

client  
**Hallam Land Management Ltd**

project  
**Walton Hill House Farm  
 Stone**

drawing title  
**INDICATIVE PHASING PLAN**

scale  
**NOT TO SCALE @ A3**

drawn  
**SLS**

date  
**June 2012**

drawing number  
**4305-P-04**



Choose what you would like to do...

Search for Housing Assessment sites

Search for Housing Assessment sites at a location by using one of these tools to draw on the map:



1 Results Found

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Page: |

**Site No:** 31  
**Site Location:** Land at Walton Hill, Stone  
**Total Site Area:** 21.19ha  
**Date of Receipt:** 2003/06/27  
**Agent:** Keith Skirving, District Valuer  
**Agent Address:** Blackburn House, Old Hall Street, Hanley, Stoke on Trent. ST1 3BS  
**Representee:**  
**Representee Address:**  
**Requested Use:** Not Specified  
**Preferred use:**  
**Constraints:** Outside RDB, SBIs, Individual & Area TPOs, flood risk  
**Ward:** Walton Ward  
[Zoom](#) | [Read document \(pdf\)](#)

Page: |



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Click on the layer group name to see what layers are available to view on the map. Tick the boxes to turn individual layers on/off. Some layers will not be visible at certain scales.

**SHLAA 2012 Update (Strategic Housing Land Availability Assessment)**

Sites Not Currently in the Planning Process

Process

Sites Requested For Inclusion

Potential Sites within Residential Development Boundaries

Sites in the Planning Process

Current Housing Commitments

Outstanding Local Plan Housing Allocations

Borough Boundary



**The Plan for Stafford Borough  
Pre-Submission Consultation**

Ref:

**Representations Form**

**(For official  
use only)**

**Please return completed forms to:**

- Head of Planning & Regeneration, Stafford Borough Council, Civic Centre, Riverside, Stafford, ST16 3AQ
- or by email to [forwardplanning@staffordbc.gov.uk](mailto:forwardplanning@staffordbc.gov.uk)
- or by fax to: 01785 619473

**Responses must be received by 12 noon on Thursday 28<sup>th</sup> February 2013**

**This form has two parts:**

**Part A:** Personal Details

**Part B:** Your representations.

- Please complete Part B of this form for each representation you wish to make. You do not need to complete Part A more than once, but please ensure you state your name or organisation as applicable at the top of each Part B form you submit.
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- Please note that when representations are submitted only Part B of the form will be published. Contact details on Part A will not be published.

# Part A

## I. Personal Details\*

\*If an agent is appointed please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

## 2. Agent's Details (if applicable)

Title	<input type="text"/>	Mr
First Name	<input type="text"/>	Frank
Last Name	<input type="text"/>	Hayes
Job Title (if applicable)	<input type="text"/>	Associate Director
Organisation (if applicable)	Castle Homes & Properties Limited'	Wardell-Armstrong
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"/>	fhayes@wardell-armstrong.com

## Part B – Please use a separate sheet for each representation

Name or Organisation	Castle Homes & Properties Limited
----------------------	-----------------------------------

**3. What part of The Plan for Stafford Borough (including the Policies Maps document) does your comment relate to?**

e.g. Policy Reference, Paragraph, Map title	(SP 2) - Stafford Borough Housing & Employment Requirements (SP4) - Stafford Borough Housing Growth Distribution Policy Stone 2 - West & South of Stone
---	---

*If your comment does not relate to a specific part of the document, or it relates to a different document, for example the Sustainability Appraisal, please make this clear in your response.*

**4. Do you consider that the Plan for Stafford Borough is:**

- a. Legally compliant\*?**  
 Yes  No
- b. Sound\*?**  
 Yes  No

*To check a box when completing this form electronically, double click on it and select 'checked' under default value.  
 \*Please refer to the attached note for guidance on legal requirements and soundness.*

*If you have entered **No** to Q4.b. please continue to Q5. In all other circumstances please go to Q6.*

**5. Do you consider The Plan for Stafford Borough is unsound because it is not:**

- a. Positively Prepared
- b. Justified
- c. Effective
- d. Consistent with national policy

**6. Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Submission made on behalf of Castle Homes & Properties Ltd – Land Owner in Stone – Land at Walton Heath (SHLAA site reference 44)

**Policy SP2**

We object to the policy approach as set out in policy SP2 on the following grounds.

The policy approach is inconsistent with advice contained within the NPPF, Planning for Growth and the existing evidence base including the West Midlands Regional Spatial Strategy Phase II Revision.

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.

'Planning for Growth' set out a clear expectation that the answer to development and growth should wherever possible be 'yes', except where this would compromise the key sustainable development principles set out in national planning policy. It also makes it clear that the need to maintain a flexible and responsive supply of land for key sectors, including housing, should be taken into account.

The current policy does not respond to this challenge. This has been highlighted by a recent Planning Appeal Decision (APP/Y3425/A/12/2172968) which granted permission for an outline residential application within Stafford Borough.

As indicated within that Planning Inspectorate Appeal Decision, the proposed target of 500 dwellings 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 550 dwellings per year. The policy approach is therefore an attempt to constrain housing development.

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. Overall there has been continued and persistent under delivery of housing within the Borough.

Overall the housing target set out in policy SP2 is insufficient to meet previous, existing and future housing requirements and will have an unsustainable impact on borough and its communities. The NPPF makes it clear that planning policy should seek to boost housing growth rather than continually constrain it.

#### **Policy SP4**

The policy approach is unsound as it would promote unsustainable 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.

#### **Policy Stone 2 – West & South of Stone**

The recent Planning Appeal Decision (APP/Y3425/A/12/2172968) outlines briefly the scale of the challenge facing Stafford Borough. As part of the decision the Inspector noted "*The Council has not demonstrated that this (5 year housing land supply) 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*".

There is little ambiguity in the above statement that the supply of housing has been continually constrained within the Borough and the future planned growth for the Borough including Stone is insufficient. The provision of just 500 additional dwellings at Stone is not consistent with the spatial strategy and a sustainable development approach.

The policy does logically identify the West of Stone as suitable for housing growth. By virtue of the West of Stones' proximity to existing community facilities, existing public transport links and key employment locations the West of Stone represents a logical area for future housing growth. However, greater flexibility in the policy is required to ensure the delivery of housing within this sustainable settlement. Land at Walton Heath represents a key deliverable development opportunity within a highly sustainable location. A clearer policy statement is required to encourage the growth of Stone.

(attach separate sheets as necessary)

- 7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough legally compliant or sound, having regard to the test you have identified at question 5. You will need to say why this change will make the document legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

**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**

Increase the proportion of housing growth assigned to Stone over and above that assigned to Key Service Villages and The Rest of the Rural Area.

**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.

(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**





Choose what you would like to do...

Search for Housing Assessment sites

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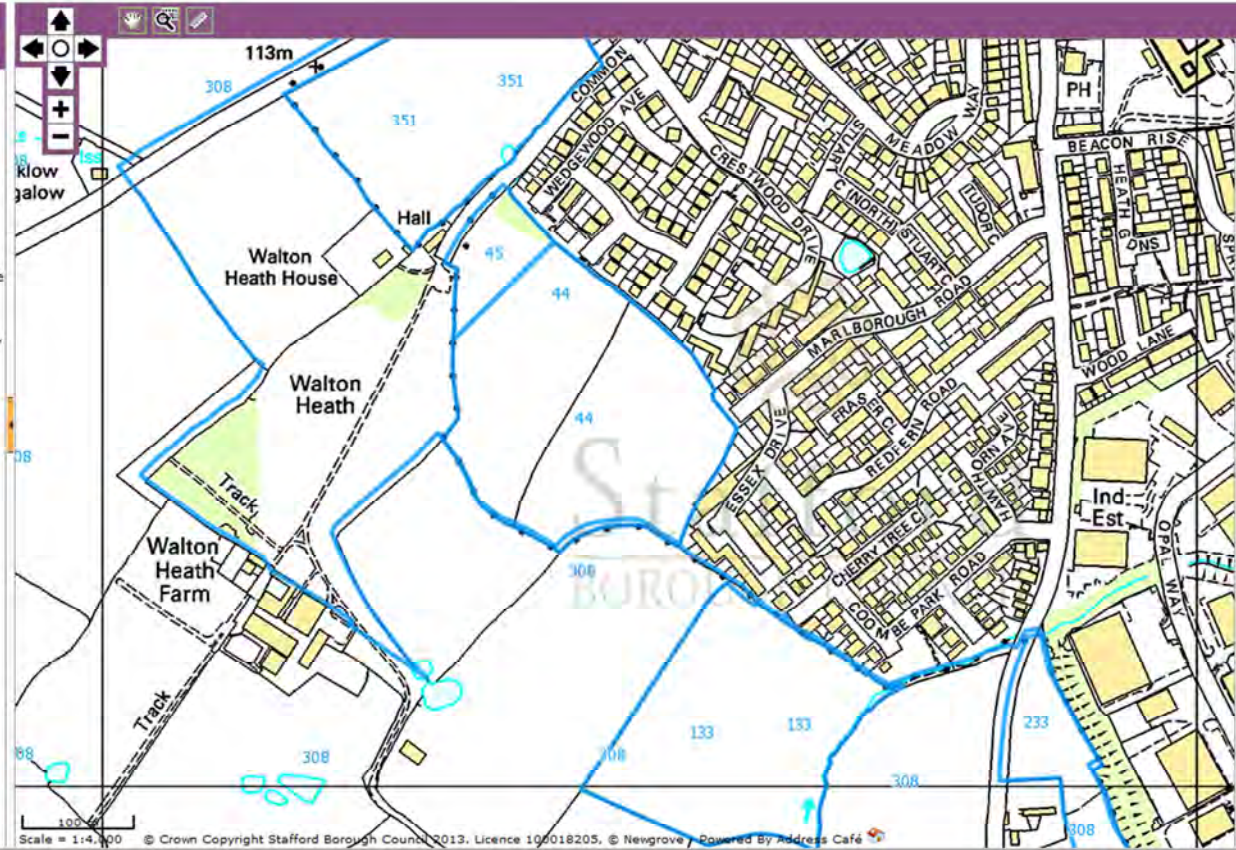


1 Results Found  
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Page: 1

**Site No:** 44  
**Site Location:** Land off Common Lane, Stone  
**Total Site Area:** 4.9ha  
**Date Of Receipt:** 2002/08/19  
**Agent:** P N Pennell  
**Agent Address:** 27 Sytch Lane, Wombourne, South Staffs  
**Representee:**  
**Representee Address:**  
**Requested Use:** Housing (50 dwellings)  
**Preferred use:**  
**Constraints:** Outside RDB, TPO tree  
**Ward:** Walton Ward  
[Zoom](#) | [Read document \(pdf\)](#)

Page: 1



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**SHLAA 2012 Update (Strategic Housing Land Availability Assessment)**

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# 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)	Barratt West Midlands	Wardell Armstrong
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"/>	(0)845 111 7777
E-mail address	<input type="text"/>	smstoney@wardell-armstrong.com

## Part B – Please use a separate sheet for each representation

Name or Organisation	Wardell Armstrong on behalf of Barratt West Midlands
----------------------	--

**3. What part of The Plan for Stafford Borough (including the Policies Maps document) does your comment relate to?**

e.g. Policy Reference, Paragraph, Map title	Policy SP2 - Stafford Borough Housing & Employment Requirements Policy SP4 - Stafford Borough Housing Growth Distribution Policy Stafford I – Stafford Town
---	---

*If your comment does not relate to a specific part of the document, or it relates to a different document, for example the Sustainability Appraisal, please make this clear in your response.*

**4. Do you consider that the Plan for Stafford Borough is:**

- a. Legally compliant\*?**  
 Yes  No
- b. Sound\*?**  
 Yes  No

*To check a box when completing this form electronically, double click on it and select 'checked' under default value. \*Please refer to the attached note for guidance on legal requirements and soundness.*

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**6. Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Previous submissions, including those by Wardell Armstrong to the Strategic Policy Choices document, and previously Milwood Homes including SHLAA submissions commencing in November 2008 - site references 95, 336 and 187. Please refer to the attached SHLAA plan.

**Policy SP2**

We object to the policy approach as set out in policy SP2 on the following grounds :

The policy approach is inconsistent with advice contained within the NPPF, Planning for Growth and the

existing evidence base including the West Midlands Regional Spatial Strategy Phase II Revision.

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.

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The current policy does not respond to this challenge. This has been highlighted by a recent Planning Appeal Decision (APP/Y3425/A/12/2172968) which granted permission for an outline residential application within the town of Stafford.

As indicated within that decision, the proposed target of 500 dwellings 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 550 dwellings per year. The policy approach is therefore an attempt to unnecessarily constrain housing development.

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 on the basis that there has been continued and persistent under delivery of housing within the Borough.

Overall the housing target set out in policy SP2 is insufficient to meet previous, existing and future housing requirements and will have an unsustainable impact on borough and its communities. The NPPF makes it clear that planning policy should seek to boost housing growth rather than continually constrain it.

#### **Policy SP4**

The policy approach is unsound as any restriction to development would promote further unsustainable development within the Plan area. Stafford is the major settlement within the Borough and the most sustainable for development, and therefore there should be no policy impediment to appropriate growth.

#### **Policy Stafford I - Stafford Town**

Give total clarity by removing any restriction related to the former Residential Development Boundary (RDB) and any status to the Stafford Urban Area in the Stafford Town Key Diagram. There is now significant precedent for housing development outside the RDB, as ratified in Appeal decision ref. APP/Y.3425/A/12/2172968.

The RDB Policy in the 2001 Borough Local Plan and saved in 2007 had 'the prime purpose of limiting development in open countryside' and 'serves to define predominantly residential areas'. There is now total sense and logic to acceptance of appropriate development of land in Stafford in that this would not prejudice acknowledged interests against a background of the more promotive principle of sustainable growth. It is inappropriate to restrict development by following the existing development patterns, and appropriate reviewed settlement boundaries to accommodate commensurate growth are required.

As expanded in the following sections of these representations, there are a number of concerns over the proposed development strategy for housing delivery in Stafford Borough. It is considered that the Plan for Stafford Borough should promote a greater number of houses with increased flexibility, focusing the majority of development at Stafford Town, to ensure that the housing requirements are appropriately achieved in line with the NPPF's promotion of sustainable development.

As stated in previous representations and unequivocally stated in the principles of the NPPF, the Plan for Stafford Borough should have a robust evidence base for it to be sound and appropriate in delivering sustainable development up to 2031. It is questioned about the lack of an appropriate clear strategy for delivery that is backed up by a deliverable housing trajectory. Such would provide the appropriate 'robust and resilient strategy' promoted in the consultation document at 3.17.

Barratt West Midlands has the appropriate land interests to the site. It is well defined within the settlement of Stafford between the M6 and the main railway line and is an appropriate and sustainable location for up to 250 dwellings, which will contribute toward the housing needs of Stafford. A scheme would be appropriately designed for its setting, including appropriate landscape buffers, and will include a mix of well designed housing of different types and tenure.

The site is available imminently and there are no legal or ownership constraints which would inhibit its development at the outset of the Plan period due to any factor including key environmental aspects.

The principle of primary road access from the A449 Moss Pit has been agreed with the Highway Authority as a priority junction design with a staggered arrangement between the site access and the Gravel Lane junction. This will incorporate a formal right turning lane in to the site which also improves the area's safety overall. Pedestrian facilities will be provided in the form of dropped crossings, tactile paving and a pedestrian refuge.

All technical requirements related to highway access have been signed off by the Staffordshire County Council.

Relevant environmental aspects have been dealt with, including an up to date ecology surveys. The site is substantially outside a flood risk area and not a landscape protection area, and does not contain any heritage interest.

The sites received full and proper analysis as part of the SHLAA process under 3 land parcels (95, 336 and 187) which affords site status as 'Site achievability – Yes' and 'Developable'.

Therefore the promoted site is considered to be an appropriate site for housing growth which would deliver a reasonable proportion of the Borough's housing requirements and contribute towards new sustainable housing provision for the south of Stafford Town.

(attach separate sheets as necessary)

- 7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough legally compliant or sound, having regard to the test you have identified at question 5. You will need to say why this change will make the document legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

### **Policy SP2**

Revise the housing growth figures in line with the guidance of the NPPF, Planning for Growth and appropriate housing market trends within the borough.

## Policy SP4

Remove any level of restriction of growth related to development in Stafford Town in order to deliver the levels of sustainable growth required.

In relation to housing delivery targets up to 2031, the Plan indicates that the Council will continue to plan for 500 dwellings a year, totalling 10,000 dwellings for the plan period, as previously proposed in the Draft Publication document. This figure was disagreed at the Plan preferred option stage.

The Plan should now duly recognise the Government's intention in the National Planning Policy Framework (NPPF) to significantly increase the delivery of new housing and that Local Planning Authorities have responsibilities in ensuring that a long-term supply of suitable land is based on identified needs.

We are concerned that the provision of 500 dwellings a year will fall significantly short of the requirements for appropriate growth.

The latest ONS Household Projections from 2008 to 2033 estimate an increase of 12,000 households within this period, with a growth in households from 53,000 to 65,000 by 2033. However, the 2008 projections have not taken into account the increase in population that is picked up in the 2010 projections including pressure for increased net migration from the West Midlands conurbation and the specific requirements of the Birmingham conurbation to accommodate significant further growth outside its boundaries.

The assessment of Option 3 in the Draft Plan recognised that providing 750 dwellings a year would be advantageous in providing greater scope for the Council to meet estimated and existing housing needs. However, this option was discounted, with the report including a lack of community support for this higher housing target as a reason for its dismissal.

The NPPF advises at paragraph 152 that through Local Plans, local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, with net gains across all three. The Plan should recognise that the needs of the Borough may be better met by a variable Option which would better enable the Council to deliver the strategic needs set out within the principles of the NPPF. Through the provision of a higher housing delivery option of say 600 to 650 homes the concerns of local people could be addressed whilst also ensuring that sufficient growth is delivered to sustain economic growth, meet social infrastructure requirements, and create new communities effectively.

Therefore, it is suggested that the Council's housing targets to 2031 be reconsidered and updated to reflect these requirements to ensure that future housing needs are met in compliance with the NPPF. The NPPF advises that Local Plans should recognise the importance of identifying strategic priorities for specific areas, including the provision of sufficient housing to meet identified growth requirement. The Plan is not considered to identify sufficient housing to meet the identified growth demands, the choices that have been presented for consultation have not been found to be positively prepared, justified and as a result inconsistent with national policy of providing a deliverable and sustainable strategic approach for growth.

(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.

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**8. If your representation is seeking a change, do you consider it necessary to participate at the Examination in Public?**

- a. **Yes** I wish to participate at the Examination in Public
- b. **No** I do not wish to participate at the Examination in Public

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To present the representation in an open and transparent manner for the Inspector's proper consideration.

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(attach separate sheets as necessary)

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**Please ensure you have printed your name or organisation at the top of this form**





# The Plan for Stafford Borough Publication

Choose what you would like to do...

Search for Housing Assessment sites

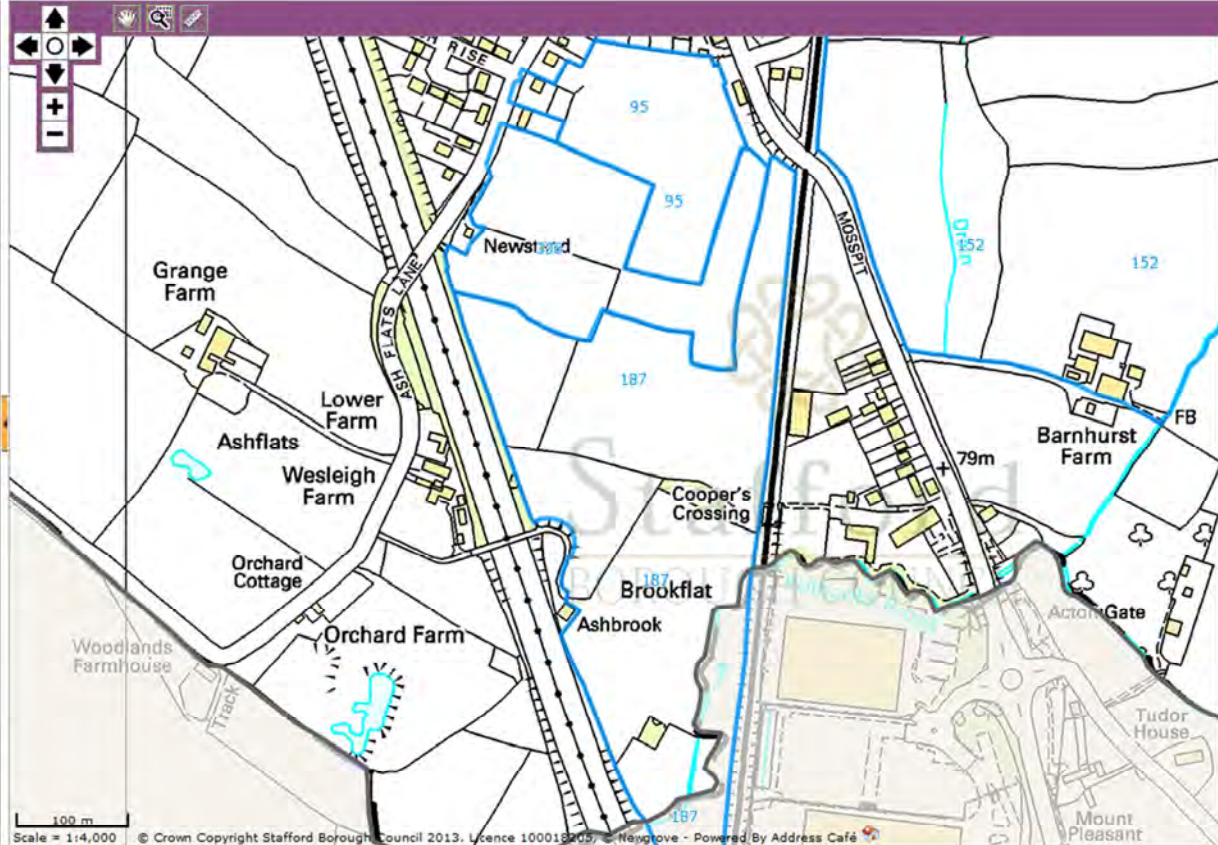
Search for Housing Assessment sites at a location by using one of these tools to draw on the map:



**Site No:** 95  
**Site Location:** Land off Chain Lane, Stafford  
**Total Site Area:** 2.51ha  
**Date Of Receipt:** 2006/06/15  
**Agent:** Gareth Smith, DTZ  
**Agent Address:** 1 Colmore Square, Birmingham, B4 6AJ.  
**Representee:** Mr & Mrs Roberts  
**Representee Address:**  
**Requested Use:** Housing  
**Preferred use:**  
**Constraints:** Majority of sites Outside RDB, SMR  
**Ward:** Manor Ward  
[Zoom](#) | [Read document \(pdf\)](#)

**Site No:** 336  
**Site Location:** Land off Ashflats Lane, Mosspit, Stafford  
**Total Site Area:** 3.27 ha  
**Date Of Receipt:** 2009/07/20  
**Agent:**  
**Representee:** Mrs T. R. Price (1 of 3 joint landowners)  
**Representee Address:** 32 Highfield Grove, Stafford, Staffs, ST17 9RA  
**Requested Use:** Not Specified  
**Preferred use:**  
**Constraints:** Outside (but bordering) RDB, Nr ProtectedSpecies, Nr FloodZones2&3, Fpath  
**Ward:** Manor Ward  
[Zoom](#) | [Read document \(pdf\)](#)

**Site No:** 187  
**Site Location:** Land At Ash Flats, Stafford  
**Total Site Area:** 9.3ha  
**Date Of Receipt:** 2008/03/26  
**Agents:**  
**Agent Address:**  
**Representee:** B J Cantrill  
**Representee Address:** Westleigh Farm,



Scale = 1:4,000 © Crown Copyright Stafford Borough Council 2013. Licence 100018205. Map data © Ordnance Survey. Map styling © Neoprove - Powered By Address Cafe

Hide Legend ?

Ordnance Survey Maps

Click on the layer group name to see what layers are available to view on the map. Tick the boxes to turn individual layers on/off. Some layers will not be visible at certain scales.

**SHLAA 2012 Update (Strategic Housing Land Availability Assessment)**

Sites Not Currently in the Planning Process

Process

Sites Requested For Inclusion

Potential Sites within Residential Development Boundaries

Sites in the Planning Process

Current Housing Commitments

Outstanding Local Plan Housing Allocations

Borough Boundary

100%

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	Mr J Butterworth and Bonds Hospital Estate Charity ( )
<b>Comment ID</b>	PS566
<b>Response Date</b>	28/02/13 11:58
<b>Consultation Point</b>	2 SPATIAL PRINCIPLE 2 (SP2) ? STAFFORD BOROUGH HOUSING & EMPLOYMENT REQUIREMENTS ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Various Policy Stafford 1 - 4 and SP2

The RSS Strategy identified that land south of Stafford should be the subject of joint working and could be land that comes forward to provide for housing as part of the Stafford requirement. No joint working has recently taken place and this is the only reason that the site has not progressed. This is not a planning reason not to consider sites, it is merely a lack of cooperation. Policy 2 and the allocation of north Stafford has landscape and some economic concerns and these need to be further considered

as well as concerns on viability, the east and west allocations raise detailed technical issues and infrastructure requirements that need to be properly examined to ensure deliverability.

Policy SP2

The approach is only to build 500 dwellings a year and this is low compared to previous estimates and should be increased.

**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.**

Recognition that land at South Stafford could form a reserve or future allocation should the need arise.

*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

**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**

To enable a full examination of the issues involved.

Forward Planning Section  
Stafford Borough Council  
Civic Centre  
Riverside  
Stafford  
Staffordshire  
ST16 3AQ



**By email and post**  
**forwardplanning@staffordbc.gov.uk**  
let.060.SW.AY.04030024/36

28 February 2013

Dear Sirs

## **THE PLAN FOR STAFFORD BOROUGH PRE SUBMISSION CONSULTATION**

We write on behalf of Seddon Homes Limited (SHL) in response to consultation on the Pre Submission Plan for Stafford Borough.

SHL is currently promoting development of land east of Stone and an application is pending determination by the Council for a small scale proposal of up to 34 dwellings on a greenfield site on the edge of the settlement boundary (Application Ref: 12/17800/OUT). However, SHL also have a number of other site interests in the area including at Trent Road and Newcastle Road, both to the west of the town (see enclosed plan). It is against this context that their comments are made.

For the avoidance of doubt, this letter should be read alongside comments submitted previously; a copy of the relevant correspondence is enclosed for completeness (dated October 2011 and July 2012).

### **Summary**

There is concern that the Pre Submission Draft Plan does not meet the tests of soundness set out at paragraph 182 of the National Planning Policy Framework (NPPF) (March 2012). It will not result in a sustainable pattern of development, contrary to the requirements of paragraph 151 of the NPPF and Section 39(2) of the Planning and Compulsory Purchase Act 2004. Therefore, it is not legally compliant.

This is compounded by its failure to adequately respond to the findings of its own evidence base and representations received during the course of its preparation. On this basis the plan has not been positively prepared.

For these reasons, further work ought to be undertaken by the Council to substantiate its approach to overall housing and economic growth, the apportionment of development to the principal settlements including Stone, and in the case of Stone, the ability of a single urban extension to the north of the town to satisfactorily address the objectively assessed housing needs of the area and delivery of growth in the short, medium and longer term.

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The following sections of this letter reaffirm the objections of SHL to the emerging plan in its current form, and set out why SHL do not consider that it meets the tests of soundness outlined in the NPPF.

## **Justification**

### Spatial Vision

The Spatial Vision for the Borough is to retain and enhance its high quality unique character whilst providing new homes and employment development, supported by infrastructure provision. Specifically for the market town of Stone, the Vision is for *'a vibrant local economy and an increased mix of high quality residential developments supporting first class business development'*.

There are a number of objectives identified to help ensure the Vision is achieved and in the case of Stone, Objective 13 states:

*'Provide new high quality homes in mix and tenure across a range of sites that mitigate against any adverse impacts and support the sustainable community' (our emphasis).*

The development strategy that follows on in the draft plan seeks to deliver the vision and objectives.

Generally, SHL supports the vision and objectives outlined, however, there is a clear conflict between these and the proposed housing strategy, details of which are set out below.

### Spatial Principle 1 (SP1) – Presumption in Favour of Sustainable Development

SHL supports the inclusion of Policy SP1 as this fully aligns with the guidance contained within the NPPF.

### Spatial Principle 2 (SP2) – Housing and Employment Requirements

SHL strongly objects to SP2 on the basis that the Council should be planning for at least 11,000 new homes during the plan period, consistent with the figures promoted through the West Midlands Phase II Revision, the award of Growth Point Status to Stafford Town and the Council's own evidence base which identifies that a far greater scale of housing is required to address population change and high levels of in-migration from surrounding areas.

We note that whilst the figures contained within the West Midlands Phase II Revision never proceeded to formal adoption, in Stafford's case, the housing target is to be taken as the most up to date housing requirement for the Borough. This was established through the recent Castleworks appeal decision (Appeal Ref: APP/Y3425/A/12/2172968) (dated December 2012) where the Inspector stated:

*'I acknowledge and have sympathy with the Council's*

*position that the phase II RSS was not examined until 2009 and will never be adopted by the Government. It is therefore not part of the development plan. Nevertheless, its contents are based on Government housing projections and are the best examined figures that they have for housing' (paragraph 30).*

To this end, it is unclear why the Council's housing requirement remains at 10,000 dwellings only for the plan period.

The Council's Strategic Housing Market Assessment (SHMA) (September 2012) provides an overview of the current housing market across the Borough and states with reference to the CLG 2008- based household projections, the number of households in Stafford is expected to increase by at least 11,000 by 2033 (a 22.6% uplift on existing). By contrast, there has only been an average of 275 new dwellings built in the last three years (paragraph 5.14). As confirmed in the aforementioned appeal decision, Stafford Borough is an authority of persistent undersupply of housing.

In addition, there is currently an annual net shortfall of 210 affordable dwellings (a gross requirement of 229), in addition to the market need identified above.

Therefore, not only is the future housing requirement (of 10,000 dwellings) inadequate to address market and affordable housing delivery, there is a need to factor in the shortfall in past completions and delivery, in particular, since 2006 (the start of the RSS plan period). It is this lack of delivery (a shortfall of 789 dwellings between 2006/07 and 2010/11) that has driven up the demand and further justification why the 10,000 dwelling figure is insufficient for future planning.

Previous representations submitted on behalf of SHL and others have identified the need for the plan to be providing for a greater level of housing growth but these comments have not been taken on board by the Council. To this end and based on this policy, the plan has neither been positively prepared or justified in this regard and fails to satisfy the tests of soundness at paragraph 182 of the NPPF.

In addition, the Council's decision to proceed with a housing target which is below that which many objectors believe is required, without any justification, is contrary to Regulation 18 of the Town and Country (Local Planning) (England) Regulations 2012 which requires local authorities to take into account any representation made to them in response to invitations under paragraph (1) of Regulation 18.

#### Spatial Principle 4 (SP4) – Housing Growth Distribution

Despite being identified as the second principle town in the Borough after Stafford (draft SP3), Stone is only afforded 8% of new housing in the emerging plan. In contrast, the smaller settlements and rural hinterland receive 20%.

SHL strongly objects to SP4 on the basis that it fails to recognise the role of Stone as a market town and as a key rural service centre in the north of the Borough. It is not clear on what basis the Council considers this approach to spatial apportionment is appropriate, however, paragraphs 6.44 and 6.45 suggest that it is based on existing populations and the pattern of development over the past 10 years.

The Council's evidence base suggests that there is a net requirement for at least 21 affordable dwellings per annum in Stone (420 in total over the plan period), in addition to the open market requirement in order to provide a better range of family homes allowing people to live in and around the town, and securing the future vitality and viability of the centre and services it provides.

The total planned requirement for Stone is currently 469 dwellings (table at paragraph 6.54) which sits well below the requirement identified in the evidence base in both market and affordable housing terms.

Conversely, delivery of the Council's housing strategy is heavily reliant on a large proportion of development coming forward in the key service villages and rural area. Whilst there is evidence of housing need and past completion rates have been high in these areas, the spatial distribution of housing should be based on the relative sustainability and capacity of settlements to take growth. In this regard, the sustainability of Stone is being completely overlooked in favour of a greater proportion of development in smaller less sustainable locations. This is contrary to the NPPF which seeks to focus development into the most sustainable locations. Draft SP3 of the Local Plan identifies Stone as the second principal town in this regard.

The distribution of 20% of the overall housing target into the rural area does not align with the Spatial Vision for the Borough and sits contrary to the evidence base supporting the plan which demonstrates that Stone is a suitable and sustainable location which should be a priority for new growth.

On this basis, SHL cannot support the strategy in its current form and considers that the approach to apportionment of development in Stone is not justified, contrary to the soundness tests of the NPPF.

#### Policy Stone 1 – Stone Town

In general, SHL supports Policy Stone 1 in so far as it seeks to increase the range and type of housing available, across a range of sites in addition to development at the proposed Strategic Development Location to the west of the town. Policy Stone 1 recognises the importance of the role of Stone as a Market Town and source of employment and as a focus for growth and development.

However, SHL strongly objects to the suggestion at paragraph 8.2 that land west of the town (identified as a Strategic Development Location in Policy Stone 2) is the most deliverable for housing development, in contrast to other development opportunities around the town.

### Policy Stone 2 – West and South of Stone

This proposed strategic development location is identified to deliver approximately 500 new dwellings (to the west) and at least 18 Ha of new employment (to the south of Stone Business Park).

Whilst SHL is not opposed to the principle of development in the proposed location, SHL does strongly object to this being the only location for new housing in Stone during the plan period.

Not only is the identification of one strategic site insufficient to meet the quantitative and qualitative housing needs of the town (as set out above with reference to the SHMA), this site is not planned to deliver development until beyond 2021 (eight years from now). It is then projected to deliver an average of 50 dwellings per annum over a 10 year period.

The draft local plan does not address how short to medium term housing needs will be addressed (i.e. between now and 2021) and it is completely contrary to the guidance of the NPPF (and draft policy SP1) to suggest that there will be a restriction on new housing development on any other sites around the town during this period. Furthermore, on the basis that the Core Strategy is unlikely to be adopted until late 2013 (at best) and preparation of a Site Allocations DPD is yet to commence, the Council cannot rely on other site allocations being brought forward in the interim. Even if the plan process were to be accelerated, it is unlikely that it will lead to the delivery of sites for at least another 12-24 months, leaving a backlog of under supply.

To this end, the emerging policies for Stone not only need to make provision for a greater level of development to come forward and spread across the full plan period, but also recognise and enable smaller sites which comply with the principles of the NPPF, to come forward earlier in the plan and enable short to medium term housing supply to be met.

With specific regard to the proposed strategic extension, there is currently a lack of available evidence to suggest that it can deliver the proposed quantum of development (i.e. circa 500 dwellings viably), and even if through comprehensive masterplanning a suitable scheme can be implemented, there is no guarantee that it will be able to support the delivery of 50 dwellings per annum (whether by one housebuilder or more) given that development will be in a single location.

Based on market absorption rates, in order for the Council to deliver 50 dwellings per annum in Stone, more than one site will need to be brought forward in this location at any time. As between April 2009 and October 2012 only 62 dwellings were completed in Stone. This further reinforces the need for the emerging policies to enable smaller sites to be delivered, across different market areas and throughout the plan period, in order to address the annual shortfall of affordable and market homes identified to exist now (in the SHMA).

In this regard, the SHL sites would make a valuable contribution to the housing



market (both in terms of market and affordable homes), the delivery of which will not undermine delivery of the proposed strategic site in the longer term.

We reiterate the view that it would be inappropriate to delay the development of new housing in Stone, particularly in light of the Council's own evidence of housing need (market and affordable) in this principal town and also if the Vision for Stone (outlined at Objective 13) is to be achieved.

### **Conclusions**

As currently drafted, the housing strategy will not deliver sustainable development contrary to the requirements of the NPPF and Section 39(2) of the Planning and Compulsory Purchase Act 2004.

It does not meet the tests of soundness as it has not been positively prepared. In this regard, it fails to recognise the findings of its own evidence which suggests that a much greater level of housing growth is required.

The strategy set out will not be effective in delivering the required level of growth, in particular in Stone, as it underplays its role as the second principal town and its relative suitability, sustainability and appropriateness for new development. Furthermore, allocations in Stone at one site will not be sufficient to achieve the supply required.

The plan should not be allowed to proceed without further work being undertaken to address the fundamental flaws in the strategy in this regard.

We trust that these comments will be taken into account and look forward to receiving further updates in terms of how the Council intends to proceed with the draft plan.

Yours faithfully



Sarah Wozencroft

Enc: Consultation Response Form  
Site Location Plan  
Copy of previous consultation responses dated October 2011 and July 2012

cc: Seddon Homes Limited



**Stafford**  
BOROUGH COUNCIL

**The Plan for Stafford Borough  
Pre-Submission Consultation**

**Representations Form**

Ref:

(For official  
use only)

**Please return completed forms to:**

- Head of Planning & Regeneration, Stafford Borough Council, Civic Centre, Riverside, Stafford, ST16 3AQ
- or by email to [forwardplanning@staffordbc.gov.uk](mailto:forwardplanning@staffordbc.gov.uk)
- or by fax to: 01785 619473

**Responses must be received by 12 noon on Thursday 28<sup>th</sup> February 2013**

**This form has two parts:**

**Part A:** Personal Details

**Part B:** Your representations.

- Please complete Part B of this form for each representation you wish to make. You do not need to complete Part A more than once, but please ensure you state your name or organisation as applicable at the top of each Part B form you submit.
- Please refer to the attached guidance notes on making representations so that they address issues of legal compliance and / or soundness.
- Please note that when representations are submitted only Part B of the form will be published. Contact details on Part A will not be published.

# Part A

## 1. Personal Details\*

## 2. Agent's Details (if applicable)

\*If an agent is appointed please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

Title	<input type="text"/>	MRS
First Name	<input type="text"/>	SARAH
Last Name	<input type="text"/>	WOZENCROFT
Job Title (if applicable)	<input type="text"/>	ASSOCIATE
Organisation (if applicable)	<input type="text"/>	INDIGO PLANNING LIMITED
Address Line 1	<input type="text"/>	LOWRY HOUSE
Address Line 2	<input type="text"/>	17 MARBLE STREET
Address Line 3	<input type="text"/>	MANCHESTER
Address Line 4	<input type="text"/>	
Postcode	<input type="text"/>	M2 3AW
Telephone Number	<input type="text"/>	0161 836 6910
E-mail address	<input type="text"/>	SARAH.WOZENCROFT@INDIGOPLANNING.COM

## Part B – Please use a separate sheet for each representation

Name or Organisation	ON BEHALF OF SEDDON HOMES LIMITED
----------------------	-----------------------------------

**3. What part of The Plan for Stafford Borough (including the Policies Maps document) does your comment relate to?**

e.g. Policy Reference, Paragraph, Map title	PLEASE SEE ACCOMPANYING LETTER WHICH PROVIDES COMMENTS ON THE PRE SUBMISSION DRAFT PLAN
---	---

*If your comment does not relate to a specific part of the document, or it relates to a different document, for example the Sustainability Appraisal, please make this clear in your response.*

**4. Do you consider that the Plan for Stafford Borough is:**

- a. **Legally compliant\*?**  
Yes  No
- b. **Sound\*?**  
Yes  No

*To check a box when completing this form electronically, double click on it and select 'checked' under default value.*

*\*Please refer to the attached note for guidance on legal requirements and soundness.*

*If you have entered **No** to Q4.b. please continue to Q5. In all other circumstances please go to Q6.*

**5. Do you consider The Plan for Stafford Borough is unsound because it is not:**

- a. **Positively Prepared**
- b. **Justified**
- c. **Effective**
- d. **Consistent with national policy**

**6. Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

PLEASE SEE ACCOMPANYING LETTER

(attach separate sheets as necessary)

7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough legally compliant or sound, having regard to the test you have identified at question 5. You will need to say why this change will make the document legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

PLEASE SEE ACCOMPANYING LETTER

(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

N/A

(attach separate sheets as necessary)

*Please note the Planning Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the Examination in Public*

**Please ensure you have printed your name or organisation at the top of this form**

## Representation Form Guidance Notes



Representations made within the consultation period will be considered alongside The Plan for Stafford Borough: Submission as part of an examination by an independent planning inspector. The purpose of the examination is to establish whether the plan has been prepared in accordance with **legal requirements**, and whether it is **sound**.

### **Representations should therefore focus on legal compliance and soundness.**

If you wish to make a comment seeking to change The Plan for Stafford Borough you should make clear in what way you consider it is not legally compliant or sound. You should try to support your comment by providing evidence and supporting information showing why it should be changed. It will be helpful if you also say precisely how you think it should be changed.

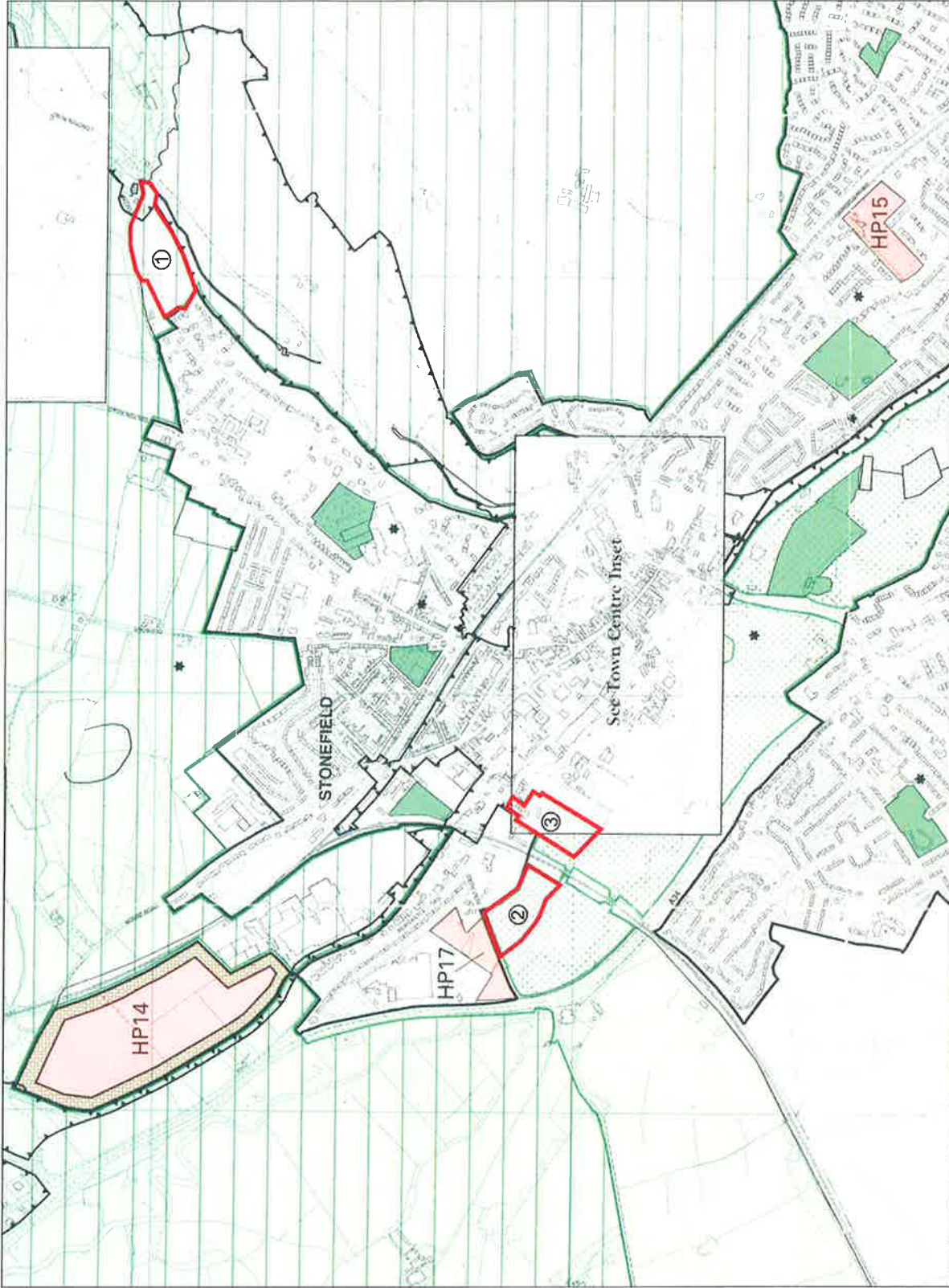
For the plan to be **legally compliant** it must:

- be prepared in accordance with:
  - the Council's Local Development Scheme (a timetable for plan preparation);
  - the Council's Statement of Community Involvement (which includes the Council's policy for community engagement on The Plan for Stafford Borough) and
  - relevant Acts and Regulations; in particular the Town and County Planning (Local Planning) (England) Regulations 2012;
- have been subject to sustainability appraisal;
- have regard to:
  - national policies, advice and guidance issued by the Secretary of State; and
  - the Stafford Borough Sustainable Community Strategy and Stafford Borough Community Action Plan;
- be in general conformity with the Regional Spatial Strategy for the West Midlands;
- meet legal requirements under the Duty to Co-operate (introduced via the Localism Act 2011).

**Soundness** is explained in the National Planning Policy Framework. For a plan to be sound it must be:

- **Positively prepared** - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements;
- **Justified** – the plan should be the most appropriate strategy based on a robust and credible evidence base;
- **Effective** – the plan should be deliverable over its period;
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

Where there are groups who share a common view on how they wish to see The Plan for Stafford Borough changed, it would be very helpful for that group to send a single comment rather than for a large number of individuals to send in separate comments which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.



Extract from Stafford Borough Local Plan 2001

- KEY
1. Nicholls Lane
  2. Trent Road
  3. Newcastle Road

Project Plan for Stafford Borough Representations

Title Site Location

Client Seddon Homes Limited

LRA Stafford Borough Council

Date: October 2011  
 Project No: 0403036  
 Drawing No: 0403036/001  
 Drawn by: KN  
 Scale: NTS - A3

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Forward Planning  
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 Civic Centre  
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 Stafford  
 Staffordshire  
 ST16 3AQ

**By email and post**  
 forwardplanning@staffordbc.gov.uk

9 July 2012

let.006.JP.04030036

Indigo Planning Limited

Dear Sirs

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**THE PLAN FOR STAFFORD BOROUGH: STRATEGIC POLICY CHOICES**

We write further to publication of the above document to provide representation on behalf of our client, Seddon Homes Limited.

Our comments follow on from those submitting in October 2011 and therefore should be read alongside our latest response (copy enclosed).

This letter sets out our key comments and objections in light of the publication of the National Planning Policy Framework (NPPF) which forms a material consideration and in accordance with which emerging Local Plans must be prepared (NPPF paragraph 182).

**The Scale of Housing: Borough-wide Development Strategy**

Questions 1 & 2

As set out in our previous letter, we believe that the Council should be planning for at least 11,000 new homes during the plan period, consistent with the figures promoted through the West Midlands RSS Phase II Revision, the award of Growth Point Status to Stafford Town and Council's own evidence base which identifies housing need. On this basis we object to the preferred approach taken within chapter three of the document to set an annual housing provision of 500 dwellings.

Not only has the Council set a restrictive target, the current proposals limit the housing target further by factoring in 'committed' sites, which total some 3,000 units, thereby leaving the Council with a significantly lower target of 7,000 over the plan period. We object to the approach taken which is contrary to the positive approach to plan preparation required by the NPPF.

Paragraph 17 states that:

*"Every effort should be made objectively to identify and then meet the housing... needs of an area, and respond*

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Simon Nade  
 EA House MRT13

Philip Viles  
 EA House MRT13

Paul Wynn  
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 RSS PLAN

El Dandou  
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Matthew Mansfield  
 EA House MRT13

Guan W. Guo  
 EA House MR13 MRT13

Tin Wong  
 EA House MRT13

Kevin Greenough  
 EA House Eglf/Dg/JG MRT13

David Lam  
 EA House MR13 MR13 MRT13

Mick Kempster  
 EA House MR13 MR13 MRT13

John Spain  
 EA House MR13 MR13 MRT13

Also in London, Leeds and Dublin



need, elsewhere this approach will only serve to encourage growth in isolated areas leading to increased travel by private car and would be contrary to the Council's sustainable development objectives and those of the NPPF.

Given this, apportionment to Stone should be between 10% - 15% equating to circa 700 and 1,000 dwellings over the plan period (based on a requirement of 11,000 dwellings as set out earlier).

Not only would this level of housing in Stone address local housing needs, including delivery of affordable housing, it would enable a number of smaller sites to come forward to meet short to medium term housing needs, with the proposed strategic extension targeted for delivery later in the plan.

#### **Phasing of Delivery and Strategic Site at Stone**

Although not covered within the Strategic Policy Choices document, we take this opportunity to comment on the Council's stated preference for a single strategic site at Stone, located to the west of the existing settlement (SHLAA site 31), and the Council's intentions to delay the delivery of housing on this site to later phases of the Plan as suggested in Core Policy 2 of the Draft Publication Local Plan (October 2011).

Firstly, we consider that it is not sustainable, justified or consistent with national policy to identify only one strategic site for new housing in Stone. The proposed strategic site is and is separated from the town's main amenities and services by Westbridge Park and the River Trent, giving rise to questions about the site's merits in terms of sustainability. The NPPF states that plans should have regard to market signals and ensure choice and competition in the market (NPPF paragraph 47), but the Council's approach to locate all new housing on one site does not allow flexibility for other sites to come forward for development.

Allocating a single site in this way does not have regard to the current housing market conditions and slow rate of delivery seen over recent years that can be expected to continue well into the plan period. This does not assist in meeting the identified need for additional housing in the town and therefore a more suitable approach would be to allocate a variety of smaller sites to offer choice and encourage growth in the market. Based on the suggested increased apportionment to Stone, this does not preclude development of the planned strategic extension in Stone but would address local housing need in earlier years of the plan.

Seddon Homes Limited has an ownership interest in three sites at Stone, all of which were identified in the SHLAA as being either deliverable or developable. SHLAA sites 64, 309 and 326 are still available and are identified as developable alongside the identified strategic site. They are also closer to the town's amenities and services and therefore represent suitable housing sites.

We reiterate our view that it would be inappropriate to delay the development of new housing in Stone. Indeed, this would be contrary to the clear national

direction in NPPF to plan positively for new growth and meet local need. This position is further reinforced by reference to the Inspector's Report for Central Lancashire which made clear the imperative for maintaining a level of flexibility to ensure growth, and commended the Council's approach to allow for over-provision during the first part of the Plan period to ensure the supply of housing is maintained (paragraph 51 of Inspector's Report). In light of this, and as we stated in our previous representation, it would be better to bring greater flexibility to site allocations, allowing a greater number of sites to come forward in a phased manner in earlier stages in the Plan.

The Strategic Policy Choices document identifies that 17% of commitments have been located in Stone, however there is no breakdown in either this document, or the Annual Monitoring Reports, as to the level of actual completions.

As mentioned above, Seddon's sites at Stone were all identified in the SHLAA as being either deliverable or developable. Indeed, their first phase of development at Newcastle Road (application reference: 10/14329/FUL) is already nearing completion demonstrating Seddon's excellent track record for delivery.

In light of the national direction in NPPF to encourage the delivery of new housing it is considered that the sites at Nicholls Lane and Trent Road would be suitable sites to meet the Borough's short to medium term need for new housing in Stone.

### **Affordable Housing**

Paragraph 6.10 confirms the Council's approach to seeking a provision of 30% of the total number of dwellings on sites for affordable housing. We support the acknowledgment that there is scope for the level of provision to be varied on a site by site basis subject to viability testing.

### **Means of Directing Growth**

We support the principle of the Plan identifying new residential development boundaries relating to the spatial distribution of growth proposed through the plan, subject to seeing further details as the DPD progresses to examination.

### **Conclusions**

The NPPF is clear that Local Plans need to show that they are positively prepared, justified, effective and consistent with national policy in order to be found sound at examination (paragraph 182).

In its current form the emerging Local Plan does not plan positively; it sets a conservative housing target, shows lack of flexibility by identifying a single strategic housing site in Stone and phases development back to later stages of the Plan as suggested in Core Policy 2 of the Draft Publication Local Plan.

We contend that the Council should not only be planning for a minimum of 11,000 new dwellings across the Borough; 10-15% should be apportioned to Stone and in this context, additional sites beyond the current proposed extension in Stone should be identified for development.

We trust that our comments will be taken into account and look forward to receiving written confirmation of receipt and information regarding future consultations.

Yours faithfully

A handwritten signature in cursive script, appearing to read 'Jen Popplewell', written in dark ink.

Jen Popplewell

Enc: Letter dated 19 October 2011  
cc: Seddon Homes Limited



Forward Planning  
 Stafford Borough Council  
 Civic Centre  
 Riverside  
 Stafford  
 ST16 3AQ

**By email and post**  
 forwardplanning@staffordbc.gov.uk

19 October 2011

let.002.CB.KW.04030036

Dear Sir/Madam

**THE PLAN FOR STAFFORD BOROUGH, DRAFT PUBLICATION:  
 CONSULTATION RESPONSE**

We write further to the publication of the above document to submit representation on behalf of our client, Seddon Homes Limited.

Seddon Homes Limited has an ownership interest in three sites around the town of Stone. These sites are located at Nicholls Lane (north east), Trent Road (west), and Newcastle Road (west) respectively; the location and extent of each can be seen on the enclosed plan. Each of these sites has been identified in the Council's 2011 SHLAA Review as being either a deliverable or developable site for residential purposes (references 64, 309 & 326, and 131a & 285 respectively) and as such each should be given due consideration in helping to meet the future housing need for the town.

The Council's housing requirement for Stafford Borough has been set out in Appendix A of the Draft Plan. This requirement is stated as being 10,000 additional dwellings between 2011 and 2031, i.e. 500 additional dwellings per annum. The Draft Plan acknowledges the contribution that sites identified in the SHLAA (2011 Review) as 'potential developments', i.e. those within the residential development boundary but not currently in the planning process, will make to overall housing development, discounting this figure by 25% to allow for sufficient development land provision. For Stone, the SHLAA indicates that there is a potential yield of 242 new dwellings from such sites, being discounted to approximately 180. The Draft Plan identifies a requirement for an additional 500 (approx.) dwellings required within Stone up to 2031, with Core Policy 2 stating that '*development in Stone may be phased later in the Plan period where the cumulative completion rates for the Borough exceed 500 new homes per year*', Core Policy 7 referring to and Core Policy 8 identifying a Strategic Development Location to the west of Stone which could accommodate the balance of new development for the town.

Objection

On behalf of Seddon Homes Limited, we wish to object to the above, principally, to the overall figure for new development of 10,000 additional new dwellings to 2031; the requirement for only 500 additional dwellings within Stone (over and

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above those identified by 'potential development sites'); the potential for additional development in Stone to be phased to later in the Plan timeframe; and the principle of identifying only a single strategic site in proximity to Stone to accommodate the additional housing requirements.

#### Justification

##### *Housing Need*

The draft RSS for the West Midlands was progressed through to the Panel Report stage in 2009, at which point it was acknowledged that the policy was 'sound' and therefore confirmed the need across the Stafford Borough for an additional 11,000 homes between 2006 and 2026, equating to an annual average of 550 dwellings. Although the recommendations of the Panel were never progressed through to the 'Proposed Changes' stage (with work halted when the regional assembly was dissolved and the coalition government signalled its intention to abolish regional strategies completely) the position on housing requirements has not reduced. If anything, due to changes in the economic climate and the reduction in housing completions over that period, the need for additional housing will be greater to the Plan date of 2031.

Since 2006, the Council's housing monitoring reports indicate that a total of 2403 dwellings have been built, equating to 400 per annum (HMR 2011). This is clearly well below the anticipated 550 per annum identified within the RSS.

This suggests that not only should the annual target of 550 be adopted in the emerging Plan, but an allowance should be factored in for the shortfall of development already experienced between 2006 and 2011, i.e. 897 dwellings or an additional 45 dwellings per annum for the period 2011 - 2031 (as the RSS figures related to the period of 2006 – 2026).

In addition to the concerns relating to the headline number of new dwellings required, we are concerned with the apportionment of these across Stafford town, Stone and the rural areas. The Draft Plan directs only 7% of new development towards Stone. Having regard to the current distribution of population across the Borough, other economic development objectives for the town of Stone, and the identified need to rebalance the demographic make up of the town, it would be more appropriate to increase the level of housing being directed towards Stone. A simple revision of the apportionment, in line with the distribution considered as part of the RSS consultation, would be to increase the proportion of new development for Stone, potentially to 15%, which would increase the overall housing requirement for the town to approximately 1,650. When factoring in existing commitments (HMR 2011), and making an allowance for SHLAA 'potential developments', this would result in the need for an additional 1,160 dwellings for Stone. Even reducing the apportionment to allow for 10% of new development to be directed to Stone there would still be a net requirement of 610 new homes.

We therefore request that the Council revisit their new housing requirements to increase the overall requirement, and reassess the apportionment across the

Borough to better reflect the needs of the respective towns and rural areas (and to reflect the contribution new housing development can make in helping to support/realise economic development objectives).

#### *Timing of Development*

It would be both impractical and inappropriate to delay the development of residential development in Stone in the manner suggested by Core Policy 2. It is difficult for the planning process to control the correlation between granting planning permission and that permission being implemented. If this approach were to be adopted then it could potentially undermine any developer confidence in pursuing residential proposals for new development in the town and could hinder development to the detriment of the local economy.

It would be more appropriate to allow for a number of strategic sites to be identified and to release these in a phased manner rather than identifying one strategic site and applying a potential threat to release of the site in the manner currently suggested.

#### *Strategic Site Identification*

It is not sustainable, nor is it consistent with the provisions of PPS1 or PPS3, for the Council to identify only one strategic site for residential development at Stone. Although the housing need targets have made an allowance for development being undertaken on those sites identified as 'potential developments' from the SHLAA, this approach is also questionable as the sites should not be taken into account as providing for definitive development unless they benefit from extant planning permission.

The single identified strategic site lies outside the residential development boundary and as such all other sites with potential to provide 10+ residential dwellings (as identified in the SHLAA) should be given equal consideration in meeting the identified need, or as suggested, the increased, new development targets.

As set out in the SHLAA, part of the consideration of sites in terms of whether they will be deliverable or developable is whether they are a suitable location to contribute to the creation of sustainable communities. The identification of one single strategic site would not contribute to the creation of a sustainable community. It would be more sustainable to build on the existing communities by providing for the ability to develop and number of smaller, peripheral sites which lie adjacent to, and can therefore be integrated with, existing residential areas and the town centre.

Allocating a single site for housing growth in this way fails to take account of the constrained housing market that exists currently and can be expected to persist during much of the plan period. Rates of sales on individual residential developments are running at half their long term average and this imposes an upper limit on the number of units that a single site can deliver in one year. Only through providing a number of different sites can the mix of sizes

and designs be created such that a sufficient number of new homes can be funded and built within Stone. A variety of sites offers home buyers choice and enables developments in Stone to appeal to a wider demographic as well as allowing for preferences in terms of location. The “all or nothing” approach delivered by allocation of a single site presents unnecessary risk to housing delivery and is unjustified in the situation that exists where other sites are available and developable.

Paragraph 8.45 of the draft Plan confirms that there is insufficient land within the urban boundary to provide significant new housing in Stone (a required need identified by the LDF background papers) and, as such, acknowledges the requirement for development on Greenfield sites at the edge of the town. Neither this paragraph, nor the background papers informing the LDF process suggest that the requirement for additional residential development within the town should be restricted to the west of the existing urban area, or within a single site. There is no demographic or physical justification for this approach and as such it is flawed and unjustifiable.

#### Suggested Changes

The Council’s SHLAA Review 2011 makes it clear that the three sites owned by Seddon Homes Limited (as referred to above), located in and around the periphery of the town, are suitable, available, and achievable for housing development. They are all well located in terms of proximity to the existing urban area, infrastructure and services, and could contribute towards meeting the housing need in a more organic manner, better reflecting the natural evolution of the town.

In order to achieve sustainable communities, with a range of housing types available to all across the town of Stone, the Plan should acknowledge the potential for a number of strategic housing sites across the town and this should include the potential to include the above three sites.

We would be grateful to receive acknowledgement of this representation.

Yours faithfully



Clare Bland

Enc: Site location plan  
Consultation Response Form

cc: Seddon Homes Limited

If you require additional space for your response, please photocopy this form.

**Please provide your name and address below. If you are an agent acting on behalf of a client, please specify**

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Thank you for taking the time to provide your comments. All comments will be taken into account when preparing the *Plan for Stafford Borough - Publication* document. Please return this form to the following address, ensuring receipt by **12 noon on Friday 21st October 2011** :

Forward Planning  
Civic Centre  
Riverside  
Stafford  
ST16 3AQ

or e-mail your comments to [forwardplanning@staffordbc.gov.uk](mailto:forwardplanning@staffordbc.gov.uk)

You can also make comments via our online consultation system at <http://staffordbc-consult.limehouse.co.uk/portal/>

Please note that your contact details will be added to our LDF Database, and you will be contacted, unless otherwise requested, regarding LDF progress and future consultations.

**Please specify your contact preference (please tick one answer)**

*(please tick one answer)*

- E-mail .....
- Post .....
- No preference .....



## Draft Publication Response Form

**Please specify the question or paragraph number your comments relate to**

**Please provide your comments below**

SEE COVERING LETTER

**Please specify the question or paragraph number your comments relate to**

**Please provide your comments below**

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	Indigo Planning on behalf of Commercial Estates Group
<b>Comment ID</b>	PS568
<b>Response Date</b>	28/02/13 11:19
<b>Consultation Point</b>	The Plan for Stafford Borough - Publication ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	0.5

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 Local Plan Strategy 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 Plan for Stafford Borough is Sound?** No

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough 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

**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**

CEG IS A KEY LANDOWNER IN THE DELIVERY OF LAND AT STAFFORD EAST WHICH IS ONE OF THE COUNCIL'S THREE PRINCIPAL LOCATIONS FOR DEVELOPMENT IN STAFFORD TOWN. THEY HAVE CONSISTENTLY WORKED WITH THE COUNCIL AND SOUGHT TO PROVIDE INFORMATION IN SUPPORT OF THE PLAN (INCLUDING THE COUNCIL'S GROWTH POINT BID IN 2008) AND HAS AN IMPORTANT ROLE IN ENSURING THE PLAN CAN BE FOUND SOUND.



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28 February 2013

Dear Sirs

## **STAFFORD EAST**

We write on behalf of Commercial Estates Group (CEG) in response to consultation on the Pre Submission Draft Plan for Stafford Borough.

CEG is currently working with the Council and adjoining land promoter (First City) to bring forward development at Stafford East, which is one of the Council's identified Strategic Development Locations for growth in Stafford Town. Public consultation on a scheme for approximately 650 dwellings was undertaken earlier this month, and an application for the development is shortly to be submitted. It is therefore against this context that these comments have been provided.

For the avoidance of doubt, this letter should be read alongside comments submitted previously; a copy of the relevant correspondence is enclosed for completeness (dated October 2011 and July 2012).

## **Summary**

CEG supports the principles of the overall strategy, in particular, the focus on Stafford Town as a priority for new employment and residential development and the identification of Stafford East as one of three key locations to facilitate delivery of growth.

However, there is concern that the Pre Submission Draft Plan does not meet the tests of soundness set out at paragraph 182 of the National Planning Policy Framework (NPPF) (March 2012), and that it will not result in a sustainable pattern of development, contrary to the requirements of paragraph 151 of the NPPF and Section 39(2) of the Planning and Compulsory Purchase Act 2004. To this end, it would not be deemed legally compliant. This is because of its failure to adequately respond to the findings of its own evidence base and representations received during the course of its preparation. On this basis the plan has not been positively prepared.

For this reason, further work ought to be undertaken by the Council to substantiate its approach to overall housing and economic growth, in particular,

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whether the evidence in fact suggested a greater need for additional housing delivery across the Borough than that set out in the draft plan and the promotion of a greater level of development in the principal town of Stafford.

The following sections of this letter reaffirm the concerns raised previously in terms of the Council's housing strategy, and outlines why additional work ought to be undertaken by the Council in ensuring that the plan can be found sound at Examination.

## **Justification**

### Spatial Vision

The Spatial Vision for the Borough is to retain and enhance its high quality unique character whilst providing new homes and employment development, supported by infrastructure provision. With specific regard to Stafford, it states:

*'By 2031 the County Town of Stafford will have:*

*i) provided an enhanced national and regional profile through major new housing and employment developments at the Growth Point, supported by a range of new infrastructure projects;*

*l) significant levels of high quality housing including affordable and specialist housing as well as extra care provision in recognition of an ageing population'.*

There are a number of objectives identified to help ensure the Vision is achieved, including the need to provide new homes across a range of sites; provide high quality environments including new open space, habitats etc; and, delivery of new infrastructure including 'Phase 1 of the Eastern Distributor Road'.

The development strategy that follows on in the draft plan seeks to deliver the vision and objectives. Generally, CEG supports the vision and objectives outlined.

### Spatial Principle 1 (SP1) – Presumption in Favour of Sustainable Development

CEG supports the inclusion of Policy SP1 as this fully aligns with the guidance contained within the NPPF.

### Spatial Principle 2 (SP2) – Housing and Employment Requirements

CEG objects to SP2 on the basis that the Council should be planning for at least 11,000 new homes during the plan period, consistent with the figures promoted through the West Midlands Phase II Revision, the award of Growth Point Status to Stafford Town and the Council's own evidence base which identifies that a far greater scale of housing is required to address population

change and high levels of in-migration from surrounding areas.

We note that whilst the figures contained within the West Midlands Phase II Revision never proceeded to formal adoption, in Stafford's case, the housing target is to be taken as the most up to date housing requirement for the Borough. This was established through the recent Castleworks appeal decision (Appeal Ref: APP/Y3425/A/12/2172968) (dated December 2012) where the Inspector stated:

*'I acknowledge and have sympathy with the Council's position that the phase II RSS was not examined until 2009 and will never be adopted by the Government. It is therefore not part of the development plan. Nevertheless, its contents are based on Government housing projections and are the best examined figures that they have for housing' (paragraph 30).*

To this end, it is unclear why the Council's housing requirement remains at only 10,000 dwellings for the plan period.

The Council's Strategic Housing Market Assessment (SHMA) (September 2012) provides an overview of the current housing market across the Borough and states with reference to the CLG 2008- based household projections, the number of households in Stafford is expected to increase by at least 11,000 by 2033 (a 22.6% uplift on existing). By contrast, there has only been an average of 275 new dwellings built in the last three years (paragraph 5.14). As confirmed in the aforementioned appeal decision, Stafford Borough is an authority of persistent undersupply of housing.

To further inform CEG's stance on the need for the Council and emerging draft plan to be planning for a greater level of housing development, CEG commissioned Justin Gardner Consulting (JGC) to prepare a report which assesses the housing requirement in Stafford, in particular, using more up to date sources of population and household data provided by both ONS and CLG (including the first release of 2011 Census data).

JGC has developed three bespoke projections, linking population growth to the size of the labour force and into household estimates using the concept of headship rates. In converting household numbers into housing figures a vacancy rate of 2.5% has been applied.

The three projections considered by JGC can be summarised as follows:

1. PROJ1 – Trend based – linked to average migration over the past 10 years;
2. PROJ2 – Employment led – linked to a 10% increase in the resident workforce from 2011 to 2031; and
3. PROJ3 – Housebuilding – linked to dwelling provision of 500 units per annum.

The demographic trend based projection linked to migration over the past 10 years suggests a requirement for approximately 13,000 new dwellings (650 per annum). This would result in an increase in the labour force of approximately 8%.

The labour force based projection suggests a housing requirement of approximately 14,000 new dwellings (700 per annum). This is a slightly more positive employment output than seen when testing past demographic trends.

Finally, the projection linked to 500 homes per annum (PROJ3) i.e. in accordance with the Council's planned housing target, shows only a very modest increase in residents in employment (an increase of less than 2% over the full 20 year projection period – 0.1% per annum).

The projection linked to past migration trend provides a good starting point for a housing requirement. It is consistent with the requirements of the NPPF (in taking account of past trends in fertility, mortality and migration) and as such, can be considered as the best demographic estimate of housing requirements.

The projection linked to 10% employment growth looks to be a more reasonable target with regard to past trends and future forecasts of employment growth. Whilst the forecasts from this projection (in housing number terms) are slightly higher than in the demographic projection, there is a strong argument to suggest that this is a more reasonable target in order to prevent housing delivery (or a lack of) acting as a barrier to economic growth in the Borough.

In contrast, the third projection based on the proposed housing requirement in the Plan is demonstrably too low, based on what is likely to be required to meet demographic trends. It would see only a very modest increase in the number of working residents and hence this projection is unlikely to lead to economic growth, contrary to the desire of both Central Government and also the Council.

Therefore, in summary, the JGC evidence demonstrates a need for the plan to make provision for between 650 and 700 dwellings per annum (between 13,000 and 14,000 new homes overall) within the plan period.

This target would better align with the findings of the Council's own SHMA (2012) which identifies an annual net shortfall of 210 affordable dwellings (a gross requirement of 229) alone, in addition to the market need identified above. Of this requirement, approximately 149 dwellings are needed in Stafford Town each year.

Therefore, not only is the future housing requirement (of 10,000 dwellings) inadequate to address market and affordable housing delivery, there is a need to factor in the shortfall in past completions and delivery, in particular, since 2006 (the start of the RSS plan period). It is this lack of delivery that has driven up the demand and further justification why the 10,000 dwelling figure is insufficient for future planning. The target should be at least 13,000 dwellings in line with the JGC evidence.

Previous representations submitted on behalf of CEG and others have identified the need for the plan to be providing for a greater level of housing growth but these comments have not been taken on board by the Council. To this end, the plan has neither been fully positively prepared nor justified and in this regard fails to satisfy the tests of soundness at paragraph 182 of the NPPF.

In addition, the Council's decision to proceed with a housing target which is below that which many objectors believe is required, without any justification, is contrary to Regulation 18 of the Town and Country (Local Planning) (England) Regulations 2012 which requires local authorities to take into account any representation made to them in response to invitations under paragraph (1) of Regulation 18.

#### Spatial Principle 4 (SP4) – Housing Growth Distribution

CEG supports the proposed distribution of housing as set out in SP4, in particular, the recognition of the role of the County Town of Stafford and primary focus for growth.

However, in light of our comments above with regards the overall level of housing growth being planned for across the Borough, based on an increased minimum housing target of at least 13,000 dwellings across the plan period, the resulting apportionment to Stafford would also increase.

To this end, the table at paragraph 6.54 of the Plan would need to be updated with the target for Stafford increasing from 7,200 dwellings to at least 9,360 dwellings (2011 to 2031) (based on the JGC work). This is before any shortfall in past completions against the West Midlands RSS Phase II Revision Target (i.e. between 2006 and 2011) is factored in as well.

We suggest that prior to submission of the plan for formal Examination, this table be updated to reflect the past shortfall and revised housing targets for each of the respective areas for development, notwithstanding whether the overall plan target is amended.

#### Policy Stafford 4 – East of Stafford

CEG supports the identification of Stafford East as a preferred location for development in the town. In particular, it supports the overall quantum of development (circa 600 dwellings). However, as demonstrated during the public consultation events undertaken in relation to this site, there is potential for more than 600 dwellings to be accommodated on the site.

As set out above, CEG is working with the Council and adjoining land promoter (First City) to develop proposals for the site and two applications for development of the respective parcels of land (north and south of Tixall Road) will be submitted shortly. The proposals will demonstrate the suitability and deliverability of Stafford East for development.

Importantly, the scheme proposals include delivery of the Beaconside



Extension to St Thomas' Lane. This is a significant highway improvement scheme which will benefit not only the site but existing and other future development in the area. This is in addition to a package of sustainable transport measures, which relate to those already being promoted by Staffordshire County Council in this location; up to 30% affordable housing provision; and, significant new green infrastructure.

Once the Beaconside Extension has been implemented, there will be scope for additional development to come forward (in highway terms) in this location. In this regard and in land terms, there is scope for further sustainable growth beyond that currently identified further to the east.

Not only would this help deliver greater housing numbers in Stafford Town (as evidenced by the JGC work) but additional development would help fund other key infrastructure, which might include new community facilities, a new primary school etc, in the longer term.

In addressing the objectively assessed housing needs of the Borough, the Council's draft plan should therefore make provision for a larger extension of Stafford East in the longer term.

With regards other infrastructure requirements listed, we note at part *xviii*) reference is made to the need for Suitable Alternative Natural Greenspace (SANGS) being required through on-site/off-site provision and management at Cannock Chase. We have some specific comments on this requirement which we provide with reference to draft Policy N6 (below).

#### Policy N6 - Cannock Chase Special Area of Conservation

Policy N6 is designed to protect Cannock Chase Special Area of Conservation and refers to the legal tests set out in the Habitats Directive. The policy had been closely informed by the protection mechanisms established for other sites notably Thames Basin Heaths and Dorset Heaths. The policy does not however recognise a fundamental difference between these areas, that while Thames Basin Heaths are Dorset Heaths are both Special Area of Conservation (designated for the habitats they support) and Special Protections Areas (designated for birds) Cannock Chase is only a SAC.

The proposed policy prevents development within 400m of Cannock Chase SAC, this is a direct 'copy' of the policies devised for SPA/SAC sites, which was devised specifically to protect ground nesting birds from predation by domestic cats which is considered to be more pronounced within a range of 400m. As Cannock Chase is not designated for its bird populations this part of the policy is inappropriate for a site that is only a SAC.

The impact of housing upon habitats within 400m as opposed to impacts of housing beyond this limit is not supported by the evidence. There is the potential that Cannock Chase may support qualifying numbers of, for example, nightjar, that would mean the site must be considered an SPA, however to-date surveys have not yet establish this possibility

The policy also refers to a net increase in 'dwellings'. The key issues for Cannock Chase is not the increase in dwellings but the increase in population, which are not necessary one and the same thing. If this part of the policy is to be retained (taking into account the comments above), the word dwelling should be replaced by population.

The draft policy N6 makes a distinction between smaller developments and larger ones (< >50 houses). The evidence base however does not support any demonstrable difference between the impacts of developments of different sizes upon Cannock Chase.

Moreover the policy is unclear as to whether 'developer contributions' will be considered acceptable as a mechanism for mitigating the impacts of larger developments. If developer contributions are acceptable then the requirement to provide 'targeted alternative green space within or close to the development site' would appear to duplicate the developer contributions which will be partly used to secure SANGs elsewhere. This part of the policy requires further clarification to avoid potential challenges.

There is a drafting error in the penultimate paragraph which should read 'Large developments **between** [not within] 400m and 12 miles of the SAC will also be required to provide targeted alternative green space within or close to the development site.'

## Conclusions

As currently drafted, the housing strategy will not deliver sustainable development contrary to the requirements of the NPPF and Section 39(2) of the Planning and Compulsory Purchase Act 2004.

It does not meet the tests of soundness as it has not been fully positively prepared. In this regard, it fails to recognise the findings of its own evidence which suggests that a significantly greater level of housing growth is required.

We trust that these comments will be taken into account and look forward to receiving further updates in terms of how the Council intends to proceed with the draft plan.

Yours faithfully



Sarah Wozencroft

Enc: Copy of Previous Representations (October 2011 and July 2012)

cc: Commercial Estates Group

**The Plan for Stafford Borough Draft  
Publication Consultation  
September/October 2011**

**Representations on behalf of  
Commercial Estates Group**

**The Plan for Stafford Borough:  
Draft Publication Consultation  
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Representations on behalf of  
Commercial Estates Group

October 2011

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# **The Plan for Stafford Borough: Draft Publication Consultation September / October 2011**

## **Representations on behalf of Commercial Estates Group**

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# **The Plan for Stafford Borough: Draft Publication Consultation September / October 2011**

## **Representations on behalf of Commercial Estates Group**

Appendices

### **Appendix 1**

Site Location Plan

### **Appendix 2**

Representations to 'Borough Wide Development Strategy Consultation' (February 2008)

### **Appendix 3**

Representations to 'Delivering the Plan for Stafford: Issues and Options' (March 2009)

### **Appendix 4**

Extract from RSS Phase Two Revision Submitted Draft (December 2007)

### **Appendix 5**

Extract from RSS Phase Two Revision Panel Report (September 2009)

### **Appendix 6**

Capacity Plan

### **Appendix 7**

Extract of Eastern Extension taken from The Plan for Stafford (September 2001)

### **Appendix 8**

Site Context Plan for Eastern Extension

### **Appendix 9**

Protected alignment of Stafford Eastern Distributor Road

### **Appendix 10**

Cabinet Report (2005)

### **Appendix 11**

Figure 2.4 of Infrastructure Study (July 2009)

### **Appendix 12**

Alternative Route for Eastern Access Improvement Scheme

### **Appendix 13**

Framework masterplan

**The Plan for Stafford Borough:  
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September / October 2011**

Representations on behalf of  
Commercial Estates Group

# 1. Introduction

- 1.1. This Statement has been prepared on behalf of Commercial Estates Group (CEG) in response to Stafford Borough Council's (SBC's) consultation on The Plan for Stafford, published in September 2011.
- 1.2. CEG is promoting land to the east of Stafford Town for development. A site location plan is contained at **Appendix 1** which identifies the extent of CEG's land interests.
- 1.3. The principle of development to the east of Stafford Town has been previously considered by the Council through earlier consultations on the Core Strategy, in particular, in the Issues and Options papers published in January 2008 and February 2009.
- 1.4. This Statement is submitted further to the comments made in response to these earlier consultations, reflecting not only CEG's continued commercial interests in Stafford but the suitability of development to the east of the town in accommodating future development.
- 1.5. The following sections set out our response to The Plan for Stafford, with reference to guidance contained within PPS1, PPS12 and the draft National Planning Policy Framework (NPPF) and with particular regard to:
  - the level of housing growth required during the plan period;
  - how future housing might be apportioned between settlements;
  - the ability of Stafford Town to deliver growth including the apportionment of development around the town; and
  - how this relates to delivery of supporting infrastructure.
- 1.6. A copy of our previous representations is provided at **Appendices 2 and 3** for reference.



## 2. Relevant Planning Policy

2.1. This Statement has regard to planning policy at both national and regional levels. The key points from some key documents are summarised below and it is against this policy context that the following sections of this Statement have been prepared.

### **PPS1: Delivering Sustainable Development (January 2005)**

2.2. PPS1 states that in preparing spatial plans, Local Planning Authorities (LPA's) should:

- (i) *“Set a clear vision for the future pattern of development: with clear objectives for achieving that vision and strategies for delivery and implementation;*
- (ii) *Consider the needs and problems of the communities in their areas and how they interact, and relate them to the use and development of land; and*
- (iii) *Seek to integrate the wide range of activities relating to development and regeneration. Plans should take full account of other relevant strategies and programmes and, where possible, be drawn up in collaboration with those responsible for them”<sup>1</sup>.*

### **PPS3: Housing (June 2011)**

2.3. PPS3 states:

*“At the local level, Local Development Documents should set out a strategy for the planned location of new housing which contributes to the achievement of sustainable development”<sup>2</sup>.*

2.4. It highlights criteria to be used for identifying broad locations and specific sites which includes:

*“Evidence of current and future levels of need and demand for housing as well as the availability of suitable, viable sites for housing developments”<sup>3</sup>.*

2.5. PPS3 indicates:

*“the level of housing provision should be determined taking a strategic, evidence based approach that takes into account relevant local, sub regional, regional and national policies and strategies achieved through widespread collaboration with stakeholders”<sup>4</sup>.*

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<sup>1</sup> PPS1 (2005), Paragraph 32

<sup>2</sup> PPS3 (2011), Paragraph 38

<sup>3</sup> PPS3 (2011), Paragraph 38

<sup>4</sup> PPS3 (2011), Paragraph 32

- 2.6. In determining the local, sub-regional and regional level of housing provision, PPS3 advises LPA's to take into account evidence of current and future levels of need and demand for housing and affordability levels based upon *inter alia*:

*"The Government's latest published household projections and the needs of the regional economy, having regard to economic growth forecasts"<sup>5</sup>.*

- 2.7. At the local level, LPA's should set out in LDD's their policies and strategies for delivering the level of housing provision, identifying broad locations and specific sites that will enable continued delivery of housing for at least 15 years from the date of adoption, taking into account the level of housing provision set out in the RSS<sup>6</sup>.

#### **PPS12: Local Spatial Planning (2008)**

- 2.8. PPS12 confirms that the Regional Spatial Strategy (RSS) is part of the development plan for the area by virtue of Section 38(3) of the Planning and Compulsory Purchase Act 2004. It states:

*"RSS provides the overall spatial vision for the entire region, identifying the broad locations for growth, often by identification of sub regions, and major infrastructure requirements, together with the housing numbers to be provided for in local development documents. The RSS is a product of effective engagement with local authorities and others. Therefore it provides the regional framework against which local participation in creating sustainable community strategies and Core Strategies takes place"<sup>7</sup>.*

- 2.9. PPS12 requires LPA's in devising their strategies to be consistent with national policy and in general conformity with the RSS. PPS12 also allows Core Strategies to allocate strategic sites for development which are considered central to the achievement of the strategy.
- 2.10. PPS12 requires LPA's to produce a Core Strategy which includes a delivery strategy for achieving its strategic objectives. The delivery strategy should set out how much development is intended to happen where, when and by what means it will be delivered<sup>8</sup>.
- 2.11. In terms of Infrastructure, PPS12 requires the Core Strategy to be supported by evidence of what physical, social and green infrastructure is needed to enable the amount of development proposed for the area, taking account of its type and distribution. This evidence should cover who will provide the infrastructure and when it will be provided<sup>9</sup>.
- 2.12. In terms of plan period, PPS12 advises that the time horizon of the Core Strategy should be

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<sup>5</sup> PPS3 (2001), Paragraph 33

<sup>6</sup> PPS3 (2011), Paragraph 53

<sup>7</sup> PPS12 (2008), Paragraph 3.1

<sup>8</sup> PPS12 (2008), Paragraph 4.1

<sup>9</sup> PPS12 (2008), Paragraph 4.8

at least 15 years from the date of adoption<sup>10</sup>.

- 2.13. The ability to demonstrate that the plan is the most appropriate when considered against reasonable alternatives delivers confidence in the strategy. PPS12 requires LPA's to seek out and evaluate *reasonable* alternatives but clearly states that "there is no point in inventing alternatives if they are not realistic"<sup>11</sup>.

#### **Draft National Planning Policy Framework (July 2011)**

- 2.14. The overall aim of the draft National Planning Policy Framework (NPPF) is to set out the economic, environmental and social planning policies for England, which, taken as a whole, will underpin the promotion of sustainable development. Once formalised, the draft will provide the framework for the preparation of local and neighbourhood plans, as set out in the Localism Bill currently making its way through the Parliamentary process.
- 2.15. The draft NPPF sets out the Government's growth agenda and outlines three key aims for the planning system, including planning for prosperity (an economic role) and for people (a social role):

*"by ensuring that sufficient land of the right type, and in the right places, is available to allow growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure"*<sup>12</sup>.

*"by providing an increased supply of housing to meet the needs of present and future generations... with accessible local services that reflect the community's needs and supports its health and well being"*<sup>13</sup>.

- 2.16. It identifies a presumption in favour of sustainable development and that a positive planning system is essential to ensure a sustainable future can be achieved. It states:

*"significant weight should be placed on the need to support economic growth through the planning system"*<sup>14</sup>.

- 2.17. It continues:

*"All plans should be based upon and contain the presumption in favour of sustainable development as their starting point"*<sup>15</sup>.

- 2.18. The draft NPPF summarises a number of core land-use planning principles that underpin both plan making and development management, in particular, it states:

*"Planning policies and decisions should actively manage patterns of*

<sup>10</sup> PPS12 (2008), Paragraph 4.13

<sup>11</sup> PPS12 (2008), Paragraph 4.38

<sup>12</sup> Draft NPPF (July 2011), Paragraph 10

<sup>13</sup> Draft NPPF (July 2011), Paragraph 10

<sup>14</sup> Draft NPPF (July 2011), Paragraph 13

<sup>15</sup> Draft NPPF (July 2011), Paragraph 15

*growth to make the fullest use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable*<sup>16</sup>.

2.19. In terms of the preparation of development plans, paragraph 20 states:

*“Development plans must aim to achieve the objective of sustainable development. To this end, they should be consistent with the objectives, principles and policies set out in this Framework, including the presumption in favour of sustainable development. This means that plans should be prepared on the basis that objectively assessed development needs should be met, unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole”.*

2.20. The advice produced by the Planning Inspectorate for use by its Inspectors sets out that, whilst the draft NPPF is a consultation document and, therefore, subject to potential amendment, it gives a clear indication of the Government’s ‘direction of travel’ in planning policy. Therefore the draft NPPF is capable of being a material consideration in determining appeals and development plan casework.

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<sup>16</sup> Draft NPPF (July 2011), Paragraph 19

## 3. General Comments

### Proposed Plan Period

- 3.1. For the purpose of this consultation and in accordance with the 'Local Choices' paper published by the Council in November 2010, the Council has defined the proposed plan period as 2011 to 2031.
- 3.2. This approach aligns with the guidance contained within PPS12 in so far as the need for the Core Strategy to have a defined plan period of a minimum of 15 years from the date of adoption and is therefore supported, provided that the plan is able to proceed to Examination and Adoption shortly (i.e. 2012).

### Level of Housing Provision

#### General Approach

- 3.3. PPS3 and PPS12 require Core Strategies to be in general conformity with the RSS.
- 3.4. In this instance, the West Midlands RSS was adopted in 2004. However, it does not provide a housing target for Stafford Borough Council (SBC), rather, sets out a requirement for Staffordshire based on the former County Structure Plan approach.
- 3.5. In adopting the RSS in 2004, the then Secretary of State identified a number of issues which needed to be addressed in future revisions to the document. This work was subsequently undertaken in three phases with Phase Two launched in November 2005, dealing with housing and employment land requirements.
- 3.6. The RSS Phase Two Revision Draft was submitted to the Secretary of State in December 2007 and was subject to an Examination in Public (EiP) between April and June 2009.
- 3.7. Draft Policy CF3 (Level and Distribution of New Housing Development) sought provision of 10,100 dwellings for SBC between 2006 and 2026 (at a rate of 505 dwellings per annum), with 7,000 dwellings to be focused into Stafford Town. An extract of the Draft Phase Two Revision detailing the proposed requirement for SBC is contained at **Appendix 4**.
- 3.8. The subsequent Panel Report (published September 2009) concluded that the strategy was 'sound' subject to some modifications.
- 3.9. With regards Stafford and its future housing requirement, recommendation R3.1 (page 87) of the Panel Report advocates a figure of 11,000 (at a rate of 550 dwellings per annum between 2006 and 2026) with potential for a further 1,000 additional dwellings for Defence

Personnel related to Stafford. It is also worthy of note that of this 11,000 total, 8,000 dwellings are to be directed towards Stafford Town. This reflects the growth aspirations of SBC and the implications of the award of Growth Point status in 2008.

- 3.10. An extract of the Panel Report is enclosed at **Appendix 5**.
- 3.11. However, the recommendations of the Panel were never progressed through to the 'Proposed Changes' stage and work halted when the regional assembly was dissolved and the coalition government signalled its intention to abolish regional strategies completely. This position remains unchanged.
- 3.12. Nonetheless, the findings of the EiP Panel Report in so far as the apportionment of housing to Stafford remains a material consideration of significant weight for the purposes of considering the emerging Core Strategy and growth strategy contained within.
- 3.13. On this basis and in the absence of a locally derived housing target, the Council should adopt the RSS housing target recommended by the EiP Panel of 11,000 dwellings (550 dwellings per annum) relating to a 20 year period.
- 3.14. Whilst the proposed plan period for the Core Strategy (2011 to 2031) is different to that on which the RSS Phase Two Revision was based (2006 to 2026), as both are 20 year periods and the principle of a requirement of 550 dwellings per annum has already been established, the same figure can be rolled forward.
- 3.15. This represents the most up to date evidenced figure that accords with the requirements of PPS1 and PPS12.

### **Proposed Housing Figure**

#### Total requirement

- 3.16. The Plan for Stafford, in particular Appendix A, identifies a housing target for SBC of 10,000 dwellings over the plan period 2011 to 2031. This is reportedly based on the 2008 household projection figures for SBC which identify a total demand of 11,523 new homes over the period 2008 to 2033.
- 3.17. Table 7 at Appendix A states that this 10,000 figure includes the '*growth point commitment and Ministry of Defence personnel*'.
- 3.18. However, this figure is lower than that supported by the Council through the RSS Phase Two Revision process and endorsed by the EiP Panel Report in 2009.
- 3.19. Furthermore, it should not account for any housing required for Ministry of Defence personnel. This matter was discussed at length at the RSS Phase Two Revision EiP and

the Panel Report concluded this to be the case.

- 3.20. Whilst we have not sought to review the 2008 household projections in any detail, by virtue of the fact that the Council is suggesting they identify a housing requirement in excess of 11,000 new homes, this further supports the case that the Council's housing target should be at least 11,000 (as endorsed by the EiP Panel Report) excluding any requirement for additional housing for Ministry of Defence personnel. This equates to a requirement of 550 dwellings per annum.
- 3.21. In addition, the Council should be factoring in any shortfall in provision against the proposed RSS Phase Two Revision target of 550 dwellings per annum since 2006, and adding this to the total requirement moving forwards for the period 2011 to 2031. In this regard, we note that the Council has delivered a total of 1,961 dwellings between 1 April 2006 and 31 March 2011, against a total requirement of 2,750 dwellings (a shortfall of 789 dwellings). This shortfall should be added to the overall requirement of at least 11,000 in planning for growth between 2011 and 2031.
- 3.22. This approach sits squarely with the Government's growth agenda as outlined in the draft NPPF and is consistent with that being adopted by examining Inspectors of Core Strategies in local authorities elsewhere.

#### Housing provision

- 3.23. Table 7 reports that as at 31 March 2011, the Council has 3,077 committed dwellings which will help meet the overall housing target. In addition, a further 1,715 dwellings have been identified on sites identified through the Council's Strategic Housing Land Availability Assessment (SHLAA), giving an overall total of 4,792 dwellings.
- 3.24. However, both figures have been discounted by SBC (by 25% and 75% respectively) as a '*flexibility allowance to ensure sufficient development is provided through the Plan, subject to annual monitoring of completions and new commitments*'. The total number of discounted commitments is therefore presented as 2,736 dwellings (2,307 + 429).
- 3.25. Factoring in these commitments and the potential development of certain SHLAA sites, the Council asserts that the number of new dwellings and scale of development actually required during the plan period is 7,000 dwellings across the whole Borough. This equates to a requirement for 350 dwellings per annum between 2011 and 2031.
- 3.26. Whilst the principle of recognising the contribution existing commitments can make to meeting future housing needs is acceptable, the Council should not be factoring in delivery of development on SHLAA sites (i.e. the 429 dwelling figure) unless these dwellings have been granted planning permission and therefore represent a planning commitment.

- 3.27. It would be helpful if the Council could provide a schedule of these SHLAA sites and confirm their status on the basis that the Council is relying on their delivery and they are being used to inform decisions about future levels of housing growth which need to be planned for.
- 3.28. We note that a schedule of the commitments (i.e. the 3,077 dwelling figure) is provided in the Council's Land for New Homes Monitor (2011). Having reviewed this document, in particular, Table 9 which provides a breakdown of this figure, it is evident that 531 dwellings are pending a S106 agreement, 94 dwellings relate to applications for extensions of time for their implementation, with a further 873 dwellings subject to outline planning permission only (some of which date back as early as 2005).
- 3.29. We therefore agree with the Council's approach to discounting the delivery of existing commitments, by a minimum of 25% and question whether some of these sites will ever come forward given the length of time they have been approved but not implemented in the context of a buoyant housing market.
- 3.30. Again, it would be helpful if the Council could provide a schedule of those sites which have been discounted in deriving a figure of 2,307 dwellings (a discount of 770 dwellings).
- 3.31. Taking all of this into account, demonstrates the fact that the Council's proposed housing requirement of 7,000 new homes falls short of what is actually likely to be required and should be planned for through the Core Strategy and notwithstanding the requirements of the draft NPPF which seeks to promote increased levels of growth and accelerated delivery.
- 3.32. Having regard to our earlier comments regarding the overall housing target being at least 11,000 dwellings, the new dwelling requirement should be at least 8,693 dwellings across the Borough (factoring in delivery of 2,307 committed dwellings). This is, however, a conservative approach and there is scope for this figure to be increased further (not least to incorporate the shortfall in delivery between 2006 and 2011) in meeting the growth aspirations of the borough and for Stafford Town.
- 3.33. As a general point, development is not only required to sustain the existing economy but diversify the employment base, provide new employment, high quality homes and building on Stafford's distinctive characteristics and environment.
- 3.34. The amount of development required over the plan period goes to the core of the overall strategy and vision and underpins the allocation of sites. The Core Strategy sets the overall framework for growth and therefore needs to clearly set out what type of development is required, where, and the timeframe for delivery.
- 3.35. The overall level of housing required across the Borough is fundamental to the strategy itself being sound, its implementation and monitoring, and needs to be tied back to the available evidence base.



- 3.36. It has significant implications for the apportionment of housing within Stafford Town, Stone and the remainder of the Borough and the growth strategy for the next 20 years and the Council will need to consider the implications of its evidence base in determining the preferred approach.

Housing distribution

- 3.37. Table 7 at Appendix A sets out the proposed spatial distribution of new development based on a total requirement of 7,000 new dwellings, as follows:
- Stafford Town – 5,500
  - Stone – 500
  - Remainder of the Borough – 1,000
- 3.38. We support the overall approach to apportionment of housing, in particular, to Stafford Town as this is consistent with the approach promoted by SBC previously through the RSS Phase Two Revision process and the subsequent recommendations of the EiP Panel Report (i.e. that Stafford Town accommodates circa 70% of the total amount of future growth).
- 3.39. However, in line with our comments (above) regarding the overall level of housing, we set out below what we consider the apportionment of housing within the Borough should be, reflecting on the contribution existing commitments (albeit discounted by 25%) can make to meeting housing needs within Stafford Town, Stone and the remainder of the Borough (i.e. within the rural area).
- 3.40. Please note that the total number of discounted units identified within Table 1 (below) equates to 770 dwellings as per the Council's calculation at Table 7 of Appendix A. The only difference relates to how this figure is derived in terms of apportionment of discounted commitments between Stafford Town, Stone and the remainder of the Borough.

**Table 1: CEG's Alternative Approach to Housing Distribution**

<b>Total Housing Requirement</b>	<b>11,000 Dwellings (550 dwellings p.a)</b>
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	<b>(2011 – 2031)</b>		
<b>Apportionment:</b>	<b>Stafford Town</b>	<b>Stone</b>	<b>Rural Area</b>
	8,000 Dwellings (400 p.a.)	1,000 Dwellings (50 p.a.)	2,000 Dwellings (100 p.a.)
<b>Commitments<sup>17</sup></b> <b>(as at 31 March 2011):</b> <i>Discounted (25%)<sup>18</sup></i>	1,697 Dwellings  1,273 Dwellings	320 Dwellings  240 Dwellings	1,060 Dwellings  795 Dwellings
<b>Residual Requirement</b> <b>(2011-2031)</b>	<b>6,727 Dwellings</b>	<b>760 Dwellings</b>	<b>1,205 Dwellings</b>
<b>Total Residual Requirement</b> <b>(2011-2031)</b>	<b>8,693 Dwellings (434 p.a.)</b>		

3.41. In line with the Council's approach to apportionment (i.e. affording 70% of growth to Stafford Town) but reflecting on the number of existing commitments in each of these areas, the total number of new dwellings which the Council should be planning for can be summarised as follows:

- Stafford Town – 6,727 (out of a total of 8,000)
- Stone – 760 (out of a total of 1,000)
- Remainder of the Borough – 1,205 (out of a total of 2,000)

3.42. With particular regard to Stafford Town, this would equate to an annual requirement of approximately 336 dwellings per annum, against an overall target of 434 dwellings per annum across the Borough.

3.43. It is worth noting that the annual average figure is not an absolute target and may be exceeded where justified by evidence of need, demand, affordability and sustainability issues and fit with local and sub-regional strategies. For this reason, and owing to such considerations as the Government's agenda for growth, the relationship between housing and the economy, this annual and total provision should be regarded as a minimum requirement.

3.44. Furthermore, the Draft NPPF sets out at paragraph 109 that in order to boost the supply of housing, LPA's should, *inter alia*:

*'identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years worth of housing against their requirements. The supply should include an additional allowance of at least 20 per cent to ensure choice and competition in the market for land'.*

3.45. The accompanying Impact Assessment states:

*'Government is placing a clear expectation on local councils to be*

<sup>17</sup> Figures derived from Table 9 of Land for New Homes (2011) Report, published by Stafford Borough Council.

<sup>18</sup> Total number of discounted units applying 25% is 635 dwellings.

*ambitious in delivering housing land through ensuring more choice and competition in the land market, by requiring an additional 20 per cent of deliverable sites to be identified to meet their five year housing requirement. This policy requiring councils to identify additional 'deliverable' sites should help to provide an overall land supply that is actually viable and ready to be delivered and developed'.*

- 3.46. Our previous representations have highlighted that the housing requirement promoted through the RSS Phase Two Revision has been long supported by the Council, albeit that the RSS Phase Two Revision itself has not been formally adopted.
- 3.47. This fact when read alongside the guidance contained in PPS12 and the Draft NPPF reaffirms that a housing requirement of 434 dwellings per annum should be treated as a minimum (factoring in existing commitments) for the purpose of planning for future growth in the Core Strategy and ensuring housing delivery (or 550 dwellings per annum when taking the overall requirement of 11,000 for the Borough as a whole).

## 4. Comments on Development Strategy

- 4.1. The following sections comment specifically on the proposed growth strategy for Stafford Town (as identified at Section 7 of The Plan for Stafford), reflective of what we consider should be the overall housing requirement for the area and the ability of, in particular, the proposed urban extensions to the north, east and west of the town, in delivering this level of growth.

### **Core Policy 2: Spatial Strategy**

- 4.2. Core Policy 2 promotes the provision of 500 dwellings per year (between 2011 and 2031). This figure includes provision of military housing. The policy also seeks to secure employment growth with provision of 8 Hectares of employment land per year.
- 4.3. Development is focused into Stafford Town and Stone and reference is made to the promotion of a number of Strategic Development Locations (SDL's) within these principle centres *'on a phased basis to ensure a consistent delivery of houses for the plan period is achieved'*.
- 4.4. The reasoned justification at paragraph 7.7 identifies that Stafford Town will provide approximately 5,500 new homes and 63 Hectares of new employment land within the proposed SDL's.
- 4.5. Over the plan period, this equates to 275 dwellings and approximately 3 Hectares of employment land per year in Stafford Town.
- 4.6. As set out in **Section 3**, the Council should be planning for provision of at least 6,727 dwellings within Stafford Town, in addition to those dwellings already committed on sites in the town (i.e. delivery of a minimum of 336 dwellings per annum between 2011 and 2031). This represents an increase of circa 1,227 dwellings over and above that which is being planned for through the identification of SDL's.
- 4.7. For the avoidance of doubt, this should not include provision for military personnel, the requirements of which should be met over and above the general market housing needs as identified from the 2008 household projections and referred to by the Council in Appendix A.

### **Core Policy 3: Stafford Town**

- 4.8. Notwithstanding our comments regarding the overall level of housing that is required in Stafford Town, we welcome and support the identification of land east of Stafford as a SDL and the policy's recognition of the contribution its development can make to helping address

the growth needs of Stafford.

- 4.9. With regards its development being linked to delivery of the Eastern Access Improvement Scheme (EAIS), the principle of this approach is also supported subject to understanding further the extent of proposals, the costs of and estimated timescales for delivery of this scheme.
- 4.10. It is evident from the current wording of Core Policy 2 that the Council is seeking to promote a mixed use extension to the town to the east, including provision of 20 Hectares of employment development to provide opportunities for new and existing public and private sector businesses, and supporting further development of Ministry of Defence land. Reference is also made to the need for a mix of housing, including a greater number of specialist houses and extra care provision for the elderly.
- 4.11. The promotion of a mixed use extension to the east of Stafford is welcomed and will provide the opportunity to further build on the existing hub of activity on this side of Stafford, in particular, improving business linkages with Staffordshire University and providing high quality housing to complement new employment development in the knowledge based and high technology sectors.
- 4.12. In terms of the Transport and Access proposals, again the approach to strengthening Stafford Town's role as a principal transport hub is welcomed, in particular, exploring opportunities to improve existing public transport services, improve existing and create new cycle and walking links and ensuring that any new development is sustainable.
- 4.13. In environmental terms, proposed extensions to the town offer the best opportunity to secure wider improvements, including provision of new green infrastructure and enhancements to existing environmental assets.

#### **Core Policy 4: North of Stafford**

- 4.14. This policy identifies land to the north of Stafford as a SDL for provision of a mixed use development comprising up to 2,700 new homes, 36 Hectares of employment land and associated local retail and education facilities etc. Reference is made to the need for an access and transport strategy that:

*'maximises accessibility by non-car transport modes to Stafford town centre, nearby existing and new employment areas, identifies access points to the site and between the site and existing settlement, identifies construction access arrangements that do not disrupt existing residents and improvements to transport capacity along the A34, A513 Beaconside Road and the Redhill roundabout'.*

- 4.15. It continues:

*'A development tariff approach will be applied to all planning applications within the North of Stafford Strategic Development Location. The tariff will contribute towards the strategic infrastructure required to achieve a comprehensive sustainable development. Details of the development tariff will be set out in a future Developer Contributions SPD'.*

- 4.16. The principle of a northern extension to the town is supported as it has always been recognised that in order to accommodate the level of growth required in Stafford Town, extensions to the north, east and west would be required. However, we have a number of concerns relating to the amount of development being concentrated into this area and how future development can be effectively delivered.

#### **Quantum of development**

- 4.17. The northern extension is being promoted for 2,700 dwellings with part of the site already allocated for residential development in the adopted Stafford Local Plan (2001) (Ref: HP13). We note that this allocated area has recently been subject to an outline planning application for residential development (Ref: 10/13362/OUT) and has a resolution to grant planning permission subject to the signing of a S106 Agreement. The application relates to provision of approximately 409 residential units on land measuring 21.8 Hectares (with a net developable area of 13.7 Hectares).
- 4.18. This area is identified within the Council's SHLAA and forms part of Site Ref: 173 which covers a larger site area which reportedly measures approximately 221 Hectares. According to the SHLAA, this site can accommodate 6,630 dwellings based on 30 dwellings per hectare. However, this is calculated based on the gross site area (rather than net developable area) and assumes there are no other uses on the land. Therefore, the total amount of development achievable notwithstanding the Council's aspirations for a mixed use scheme in this location, is likely to be significantly less.
- 4.19. We have undertaken a capacity analysis of the area highlighted in The Plan for Stafford and conclude that this measures approximately 104 Hectares (see plan at **Appendix 6**). Based on a 70% net developable area (allowing 30% for roads, open space etc.) it is estimated that the Council's proposed northern extension could accommodate in the order of 2,200 dwellings (including the 409 dwellings already recently approved).
- 4.20. It is therefore not clear how the Council has derived a figure of 2,700 dwellings based on the SHLAA evidence available; the fact that the site area shown is smaller than that identified in the SHLAA; the need to promote a mix of uses; and, accounting for infrastructure provision within the site.
- 4.21. Furthermore, on the basis that the northern extension as shown in The Plan for Stafford

comprises two parcels of land, one of which is subject to outline permission for circa 400 dwellings, it is not evident how 2,300 dwellings might be accommodated on the remaining land, in addition to any necessary ancillary education and retail facilities and open space.

- 4.22. We support the provision of new employment development in this location, given the synergy of the site to existing businesses located at this key gateway into Stafford and the strategic positioning of the site adjacent to the M6 (J.14) motorway.
- 4.23. Further work should be undertaken to demonstrate that the land identified within the northern extension is capable of delivering the proposed quantum and scale of development suggested in draft Core Policy 4, in ensuring that sufficient land is being identified around Stafford Town in order to meet the overall housing and employment land requirements and wider aims and objectives of the plan.
- 4.24. In this regard, we understand that the Council has recently appointed ATLAS the Homes and Community Agency's advisory team to prepare a framework masterplan for the site. This should clarify the amount of development appropriate in this location.

#### **Relationship to MoD Stafford site**

- 4.25. The proposed site wraps around existing MoD facilities to the north of the A513 Beaconside Road and would provide limited opportunity for the MoD to expand their current facilities and operations adjacent to existing, in this location, unless it is intended that the proposed housing in this location is for returning service personnel.
- 4.26. If this the case, as set out in Section 3, The Plan for Stafford needs to make this clear in the policy wording. Furthermore, that such an allocation is over and above the need to accommodate 11,000 new dwellings to meet general market demands as identified in Section 3 of this Statement.
- 4.27. Discussions with the Council have indicated a potential requirement for 400 new dwellings for returning service personnel from 2015. This should be dealt with as separately.
- 4.28. On this basis, there is likely to be a requirement to identify additional land either as part of the northern extension or elsewhere, to accommodate the proposed level of housing required in Stafford Town. This is reaffirmed by our concerns about the scale of development that can actually be accommodated on the land identified to the north i.e. that the level of development achievable is likely to be less than 2,700 dwellings as is proposed.
- 4.29. We have a number of comments associated with the infrastructure requirements of draft Core Policy 4, in addition to the timing and delivery of this proposed SDL. These are equally applicable to draft Core Policies 5 and 6 and therefore we deal with these points separately at **Section 6**.

## Core Policy 5: West of Stafford

- 4.30. This policy identifies land in the west of Stafford as a SDL for provision of a mixed use development comprising up to 2,200 new homes, 7 Hectares of employment land and associated local retail and education facilities etc. Reference is made to the need for an access and transport strategy that:

*'identifies construction access arrangements that do not disrupt existing residents and improvements to transport capacity along the A518 Newport Road and its roundabout;*

*Support delivery of the Western Access Improvement Scheme and associated transport improvements from Martin Drive to Doxey Road'.*

- 4.31. Similar to draft Core Policy 4, the policy refers to a development tariff approach in order to secure the strategic infrastructure required to achieve a comprehensive sustainable development.
- 4.32. The principle of development of a western extension to the town is supported as it has always been recognised that in order to accommodate the level of growth required in Stafford Town, extensions to the north, east and west would be required. However, we have a number of concerns relating to the amount of development being concentrated into the proposed western extension and how the area as a whole can be effectively delivered (similar to those raised with regard to the proposed northern extension above).

### Quantum of development

- 4.33. The area is identified within the Council's SHLAA and includes Site Ref's: 43, 214 and 273. Combined, these sites cover an approximate land area of 83 Hectares (based on the information contained in the SHLAA). There is, however, a slight mismatch between the extent of land identified in the SHLAA in this location and the area shown on the plan within draft Core Policy 5.
- 4.34. According to the SHLAA, these three sites alone (notwithstanding the additional area of land identified on the plan at draft Core Policy 5) can accommodate 2,490 dwellings based on 30 dwellings per hectare. However, this is calculated based on the gross site area (rather than net developable area) and assumes there are no other uses on the land. Therefore, the total amount of development achievable, notwithstanding the Council's aspirations for a mixed use scheme in this location, is likely to be significantly less.
- 4.35. We have undertaken a capacity analysis of the area highlighted in The Plan for Stafford and conclude that this measures approximately 95 Hectares (see plan at **Appendix 6**). Based on a 70% net developable area (allowing 30% for roads, open space etc.) it is estimated that the Council's proposed western extension could accommodate in the order of 2,000 dwellings.



- 4.36. Nonetheless, as per our comments with regards the northern extension, it is not clear how the Council has derived a figure of 2,200 dwellings based on the SHLAA evidence available; the fact that the site area shown is larger than that the available evidence contained within the SHLAA; the need to promote a mix of uses; accounting for infrastructure provision within the site; and, the need to respect local environmental and historical designations, including the proximity of the site to Stafford Castle.
- 4.37. Further work should be undertaken to demonstrate that the land identified within the western extension is capable of delivering the proposed quantum and scale of development suggested in draft Core Policy 5, in ensuring that sufficient land is being identified around Stafford Town in order to meet the overall housing and employment land requirements and wider aims and objectives of the plan.
- 4.38. In this regard, we understand that the Council has recently appointed ATLAS the Homes and Community Agency's advisory team to prepare a framework masterplan for the site. This should clarify the amount of development appropriate in this location.

### **Core Policy 6: East of Stafford**

- 4.39. This policy identifies land to the east of Stafford Town as a SDL for provision of a mixed use development comprising up to 600 new homes, 20 Hectares of employment land at Beacon Hill and associated local retail and education facilities etc. An extract of the proposed extension site taken from The Plan for Stafford is provided at **Appendix 7**.
- 4.40. Reference is made to the need for a number of measures, including:
- A comprehensive flood management scheme including off-site measures to alleviate flooding and surface water management on the River Sow;
  - An access and transport strategy that maximises accessibility by non-car transport modes to Stafford town centre through walking and cycling connections, nearby existing and new employment areas, identifies access points to the site and between the site and existing settlements, identifies construction access arrangements that do not disrupt existing residents and improvements to transport capacity along the A518 Weston Road in the vicinity of the University roundabout and along Tixall Road; and
  - Delivery of the Eastern Access Improvement Scheme (EAIS) and associated transport improvements from Weston Road to St Thomas' Lane.
- 4.41. Similar to draft Core Policies 4 and 5, the policy refers to a development tariff approach in order to secure the strategic infrastructure required to achieve a comprehensive sustainable development.
- 4.42. Paragraphs 8.41 to 8.43 identify a number of issues associated with development of the east

SDL, including:

- Public transport accessibility in the area, including links to nearby education and health facilities;
- A requirement for a new waste water pumping station together with reinforcement of the water supply network and provision of a local electricity sub-station; and
- A requirement for the EAIS to be delivered between Weston Road (A518) at its junction with the A513 at Kingston Hill to the north and St Thomas' Lane linking to Milford Road (A513) to the south.

#### **Principle of Development at East Stafford**

- 4.43. We welcome and support the identification of land east of Stafford as a SDL. In particular, we support the provision of 600 dwellings on land to the north and south of Tixall Road in meeting the development needs of Stafford Town. This is the area in which CEG has its principle interests and the following sections of this Statement amplify the suitability the proposed eastern extension for development.
- 4.44. However, we object to the fact that the eastern extension is afforded a disproportionate (smaller) amount of development compared to proposals for the north and west SDL's. The Council's rationale for this is unclear, particularly when development of the eastern extension is dependent upon a level of supporting infrastructure (in particular, highways) which is at least equal to that which is required to facilitate development in the north and west.
- 4.45. We note that at the Issues and Options stage (February 2009), the Council identified land to the east of Stafford Town (Ref: SF3 Land to the north and south of Tixall Road and SF4 Land to the west of Baswich Lane) for a total of 1,500 dwellings (700 and 800 respectively).
- 4.46. As set out above, we consider that the extent of land identified by the Council in draft Core Policies 4 and 5 (i.e. north and west) is insufficient to support the level of development being proposed in these locations.
- 4.47. On this basis, in order to deliver the housing requirement for Stafford Town (i.e. 11,000 dwellings), additional land ought to be identified, including within the eastern extension, to ensure that:
- a. the Council is able to deliver the overall levels of growth required during the plan period; and
  - b. development of each of the proposed SDL's can viably support delivery of supporting infrastructure, in particular, proposed highway improvements including the Western Access Improvement Scheme (WAIS) and EAIS.
- 4.48. The principle of this approach has been previously established and consulted on at the

Issues and Options stage and it is not clear why proposals in the east have subsequently been scaled back.

- 4.49. Being located on the periphery of the urban area with good links to Stafford Town, Staffordshire University and nearby employment at Beaconside (north and east), the proposed eastern extension represents a good strategic location for future growth. In physical terms its development will sit well within the existing environment utilising key landscape features to contain the proposed expansion of the town to the east. We enclose a plan at **Appendix 8** which demonstrates the site context for the proposed east SDL.
- 4.50. This area is well linked to the town centre with frequent public transport services available along Tixall Road and Weston Road, connecting the proposed extension to the hospital, local employment and wider area which is a key benefit of development in this location.
- 4.51. There is scope for these links to be significantly improved, not only through provision of new infrastructure but improvement of existing services in this location, in particular, public transport. The development can tie into existing links with communities to both the east and west of the proposed SDL.
- 4.52. Overall, it can provide new housing (including provision of affordable housing) to meet identified local needs for the area and underpin the vitality and viability of existing services and facilities in addition to providing new and improved amenities which are required for a greater critical mass of development.

#### **Site Attributes and Location**

- 4.53. **Appendix 1** contains a Site Location Plan which confirms the extent of land controlled by CEG. The triangular area of land extends to circa 11.9 Hectares and sits adjacent to the built up area of Stafford. It has been identified in the Council's SHLAA (Site Ref: 177) as 'Developable' for housing and able to accommodate 357 dwellings (based on 30 dwellings per hectare applied to the gross site area).
- 4.54. Land to the north of Tixall Road has also been identified in the Council's SHLAA (Ref: 23) as 'Developable' for housing and is being promoted by First City on behalf of the landowner. In accordance with information contained within the Council's SHLAA, this site extends to 12.11 Hectares and can accommodate 363 dwellings (based on 30 dwellings per hectare applied to the gross site area). In addition to the comments contained in this Statement, representations have also been submitted directly by First City.
- 4.55. The final parcel of land identified for housing within the proposed eastern SDL is situated to the north west of the First City site (SHLAA Ref: 151). According to the SHLAA, the site measures approximately 1.3 Hectares and can accommodate 39 dwellings (based on 30 dwellings per hectare applied to the gross site area). It is accessed directly from Weston

Road and represents the remaining undeveloped area of an existing housing allocation (HP11) in the saved local plan.

### **Deliverability**

- 4.56. Both the CEG and First City sites are relatively unconstrained and can be developed in the short and medium term to meet Stafford Town's housing requirements.
- 4.57. In relation to the CEG site, extensive background surveys have been undertaken to establish the constraints and opportunities associated with its development. These include:
- Tree Survey;
  - Services Assessment;
  - Biodiversity Assessment;
  - Stage 1 Flood Risk Assessment;
  - Heritage Statement;
  - Archaeological Assessment;
  - Land Contamination Assessment;
  - Assessment of Existing Noise Conditions; and,
  - Transport Assessment of Existing Conditions.
- 4.58. The findings of this work confirm that the CEG site is available and suitable for development and achievable, in accordance with the requirements of PPS3. In particular:
- Land to the south of Tixall Road is controlled by CEG, whilst land to the north is being promoted by First City on behalf of the landowner. Both CEG and First City have been in discussions regarding the comprehensive masterplanning of the area as a whole and are keen to bring forward development proposals that satisfy the Council's aspirations for growth in this location.
  - There are no land ownership issues that would prevent the land from being brought forward (either both sites in isolation or together). It is available to meet short and medium term housing requirements. It is currently vacant and there are no known factors which would render it unavailable.
  - The Council has acknowledged that the land is suitable for residential development (SHLAA Site Ref's: 177 and 23). Its development would help to create a sustainable, mixed use extension to the town and address the local housing requirements of the area in the short and medium term.
  - There is potential to integrate any future development with the existing developed area, without having a detrimental impact on neighbouring residential amenity or prejudicing the integrity of the surrounding open countryside and beyond.

- There are no environmental factors that would render the land as unsuitable for residential development. On the contrary, development will provide the opportunity to improve linkages between this area of Stafford and the town centre and wider surrounding countryside, including the green corridor to the south and adjoining the River Sow.

4.59. In terms of how its development relates to proposals for the eastern extension, there are a number of options in bringing the site forward. However, these are largely influenced by the Council's requirement for provision of the EAIS, the alignment of this and how it is accommodated within the site.

#### Proposals for the EAIS

4.60. In this regard, the proposed alignment of the EAIS is currently protected in the saved local plan (otherwise referred to as the 'Stafford Eastern Bypass' in saved Policy MV7 of the local plan). An extract of the local plan proposals map showing the protected alignment is enclosed at **Appendix 9**.

4.61. However, in 2000 the proposed 'Stafford Eastern Bypass' was re-designated as a local 'distributor road'. The consequence of this is that the route is seen as a distributor road for local traffic rather than a bypass for longer distance through traffic.

4.62. The proposed route has also been subject to revisions, partly as a result of issues associated with the safeguarding of land affected by the route, from development. We enclose a copy of a report to SBC's Cabinet in August 2005 detailing revisions to the route which were subsequently endorsed by Members of the Council (**Appendix 10**). The plan on Page 5 of the report identifies the currently proposed alignment of what is otherwise referred to as the 'Stafford Eastern Distributor Road' (SEDR).

4.63. It is this proposed route that was evaluated as part of the Council's Infrastructure Study (July 2009) but against the context of bringing forward a larger area of land for development. Figure 2.4 of the Infrastructure Study (also enclosed at **Appendix 11**) identifies the potential development sites and paragraphs 2.4.1 to 2.4.6 evaluate the deliverability of this road link on this basis.

4.64. It concludes that there are '*several difficult (if not insurmountable) challenges to implementation*', including:

- *technical difficulties in terms of alignments close to residential areas;*
- *the need to cross the West Coast Main Line and replace a railway bridge;*
- *the absence of any allocated funding in the current Regional*

*Funding Allocation or Local Transport Plan; and*

- *the fact that developer contributions are unlikely to provide for the full cost of the road (not helped by the fact that the W S Atkins study demonstrates that an Eastern Distributor Road is not required to facilitate the achievement of the 7,000 homes target for Stafford)' (paragraph 2.4.4).*

- 4.65. Paragraph 2.4.2 suggests that the SEDR is only required for 'any significant development (over 200 units in this direction)'.
- 4.66. Since the Infrastructure Study has been prepared, the County Council has prepared a further alternative route (enclosed at **Appendix 12**) which departs from the previously proposed alignment in the adopted local plan (as revised in 2005). In particular, it doesn't follow the alignment to the south of Tixall Road, rather, connects to St Thomas' Lane then into Blackheath Lane. We understand from the County Council that this is only intended as a convenient way of tying into St Thomas' Lane across to Blackheath Lane and therefore were the SEDR to come forward, it would still follow its original alignment south of Tixall Road and along Baswich Lane.
- 4.67. Draft Core Policy 6 is unclear as to what is intended in terms of the proposed road link (i.e. whether this takes the form of the short term option or larger SEDR) and yet this has direct consequences on the way in which land in the eastern extension is brought forward, and the capacity of the identified sites in accommodating future growth.
- 4.68. Regard also needs to be had to the potential scale of costs associated with its implementation.

Scope for development without the EAIS

- 4.69. On this basis, as part of the feasibility work undertaken on behalf of CEG, the need for an EAIS has been explored further, reflecting on the capacity of the existing local highway network to accommodate future housing. This has highlighted that there is scope for approximately 500 dwellings to be accommodated within the current network, without implementation of the EAIS as an early phase.
- 4.70. This is based on improvement works to the existing junctions of A518 Weston Road/Blackheath Lane and Tixall Road/Blackheath Lane. The A518 Weston Road/Blackheath Lane scheme would be a variation on that consented for the Beaconside Business Park (Ref: 06/05905/OUT), with minor additional widening. The Blackheath Lane/Tixall Road improvement introduces a modified staging arrangement as well as carriageway widening and changes to the footway on the west side of Blackheath Lane. There may be alternative, preferable, improvements to this junction and we would consider these before any submission was made.

- 4.71. The A513 Beaconside/A518 Weston Road/Hydrant Way four arm roundabout junction would continue to offer a satisfactory level of provision in its current form.
- 4.72. The increase in traffic on Tixall Road west towards Stafford, is unlikely to result in a material deterioration in traffic conditions albeit development on the site would need to be supported by a package of sustainable transport measures to provide alternative modes of transport for people making the journey towards Stafford town centre, and this is considered preferable to introducing additional capacity on the route to the town centre.
- 4.73. There is therefore scope to accommodate development in the eastern extension without provision of the EAIS and this could have a direct and positive impact on the ability to deliver housing to meet the growth requirements of Stafford Town, in the short term, ahead of or at least in parallel with proposals for the north and west SDL's.
- 4.74. There is also significant opportunity to tie into planned public transport, cycle and accessibility linkages between the site, the town and the areas to the south east of Stafford.
- 4.75. In this regard, we object to the Council's suggestion within draft Core Policy 4 that the east SDL represents a 'medium term' opportunity. Rather, land to the east has the ability to deliver some development in the short term without any upfront significant infrastructure improvements and this should be reflected in the proposed strategy.

#### Masterplanning the eastern extension

- 4.76. The requirement for and proposed alignment of the EAIS has a direct impact on the masterplanning of the eastern extension, in particular, the CEG site.
- 4.77. There are, therefore, four options in bringing the site forward either in isolation to or as part of an overall masterplan for the currently defined SDL:
- Option 1 – Development without a link; or
  - Option 2 – Development which reserves a corridor for the proposed EAIS based on the original alignment (i.e. that saved in the local plan); or
  - Option 3 – Development which reserves a corridor for the proposed EAIS but also takes account of the County Council's short term improvements to St Thomas' Lane; or
  - Option 4 – Development as per option 3 but with a variation to the alignment to the St Thomas' Lane improvements along the line of the low pressure gas main which runs across the CEG site. The varied alignment would include the formation of a new roundabout junction with Blackheath Lane and replace the existing Tixall Road/Blackheath Lane signalised junction.

- 4.78. We enclose a plan (**Appendix 13**) which demonstrates the implications of the EAIS on development of the CEG site. The need to reserve a corridor of land within the site for delivery of the EAIS reduces the overall quantum of development that can be achieved to approximately 525 dwellings assuming the EAIS as illustrated at **Appendices 9 and 12** is implemented.
- 4.79. This assumes a residential density of 30 dwellings per hectare.

### Summary

- 4.80. There is a requirement for approximately 11,000 new homes across the Borough, including 8,693 in Stafford Town based on a sound and robust evidence base. This is significantly more than The Plan for Stafford currently makes provision for.
- 4.81. Combined, the three SDL's have the capacity to deliver in the order of 4,190 dwellings based on the areas of land identified within draft Core Policies 4, 5 and 6.
- 4.82. A significant amount of supporting infrastructure is required in delivering each of the proposed extensions to the north, west and east, however, we object to the disproportionate (and smaller) amount of housing which is being focused into the eastern extension area, compared to the north and west SDL's.
- 4.83. The land within the eastern extension represents an excellent location for new housing and its development will make a positive contribution to, and integrate with the eastern suburb of Stafford Town, underpinning and facilitating improvements to existing services, facilities and public transport.
- 4.84. At a policy level, development in this location will ensure that SBC meets its overall vision and objectives, including providing a sufficient 5 year rolling supply of housing to meet local needs over the plan period.
- 4.85. SBC has a growth agenda for Stafford Town, acknowledged through its bid for Growth Point status and other recent initiatives. The Council must find sufficient land to deliver housing and promote sustainable patterns of development and the proposed eastern extension can make an important contribution to realising the growth aspirations and delivering the vision.
- 4.86. Initial feasibility work has indicated that circa 500 dwellings could be delivered in the eastern extension without the need for implementation of the EAIS. Furthermore, work undertaken previously by the Council as part of the SHLAA and Issues and Options consultation (2008) has identified the potential for land to the east of Stafford Town to accommodate up to 1,500 dwellings.
- 4.87. The scale of further development in the context of the local character and environment on the eastern side of the town has been considered further. Our analysis finds that the eastern



extension can in fact readily accommodate in the order of 1,000 dwellings as part of a comprehensively masterplanned scheme.

- 4.88. Given concerns regarding the inability of the north and west SDL's to deliver the scale of development proposed by the Council in these locations; the implications the proposed EAIS on the ability of land in the east to deliver 600 dwellings; and, the Council's long standing aspiration to deliver a local distributor road to the east of the town, there is scope to promote a much larger area of development as part of the eastern extension.
- 4.89. Further work is being undertaken to assess the feasibility of delivery of the EAIS proposals alongside other off site highway works and public transport improvements and in the context of both the Council's current proposals and a wider eastern extension. Further submissions to the Council will be made in due course.

## 5. Infrastructure, Timing and Delivery of SDL's

- 5.1. Draft core policies 4, 5 and 6 highlight a number of issues with regards infrastructure provision and the timing and delivery of the proposed SDL's.

### Infrastructure requirements

- 5.2. Aside from the potential requirement for social infrastructure provision, the draft policies identify the potential need for transport improvements at all three SDL's.
- 5.3. **In the north**, draft Core Policy 4 identifies the need to increase capacity along the A34, A513 Beaconside road and the Redhill roundabout. Initial discussions with the County Council have indicated the potential requirement for significant highway improvements associated with development of the northern extension, including the proposed 'dualling' of the A513 Beaconside road. There are also likely to be traffic implications for the strategic road network (managed by the Highways Agency) which will need to be considered alongside any local highway improvement scheme.
- 5.4. **In the west**, draft Core Policy 5 identifies the need for transport improvements to increase highway capacity along the A518 Newport Road and its roundabout, improvements from Martin Drive to Doxey Road, junction improvements along Tenterbanks and Newport Road and delivery of the WAIS.
- 5.5. We understand from Staffordshire County Council that whilst the WAIS is referred to in the Local Transport Plan (2011), there are only limited funds available to assist its delivery and only a limited amount of development (if any) can be delivered utilising the existing highway network.
- 5.6. **To the east**, the Council's priority in draft Core Policy 6 is securing implementation of the EAIS.
- 5.7. In promoting all three SDL's, the Council needs to provide further information on the types of and scale of infrastructure required and the timing of its delivery, and how this relates to the phasing of development of each strategic site.

### Timing and delivery

- 5.8. There are three key points in terms of timing and delivery relevant to draft Core Policies 4, 5 and 6.
- 5.9. The first relates to the Council's suggestion that no development can come forward until a masterplan for the whole site has been prepared, submitted to and agreed by the Council in

the form of a Supplementary Planning Document (SPD).

- 5.10. Whilst it is important that the whole site is comprehensively masterplanned, the requirement to produce and then adopt an SPD could lead to significant delays in delivery of development on any site, contrary to the need to deliver new housing, employment and drive forward growth. Furthermore, it is not clear what the SPD would achieve that could not be set out through a subsequent Site Allocations DPD (or planning applications) and this approach is contrary to the requirements of PPS12 (paragraph 6.4) when dealing with strategic sites.
- 5.11. Secondly, in order to deliver any development, the extent of any supporting infrastructure required needs to be fully understood and appraised in viability terms against the scale of development proposed.
- 5.12. Thirdly, it is unclear how the Council will meet its growth requirements in the next 5, 10 and 15 years of the plan, contrary to the requirements of PPS3.
- 5.13. In earlier sections of the document, the Council identifies the northern and western extensions as deliverable in the short term (see Stafford: Objective 1). However, more information is required on how planned housing is expected to be delivered and how this fits with other elements of the strategy, for example, infrastructure provision and delivery of the WAIS, to demonstrate that land to the north and west is deliverable within the plan period and in accordance with the principles of the 'Plan, Monitor, Manage' approach set out in PPS3.
- 5.14. Conversely, land to the east is identified as a medium term opportunity yet initial feasibility work undertaken to date suggests that circa 500 dwellings can be delivered in the short term without any significant infrastructure improvements, in particular, delivery of the EAIS.
- 5.15. In the absence of any robust evidence supporting the phasing back of the eastern extension and, factoring in the uncertainty regarding the delivery timescales for development to the north and west, the Council should be seeking to promote the eastern extension in parallel with or ahead of development in the north and west to ensure a steady supply of housing and employment land which meets localised market and housing needs.
- 5.16. The phasing of the SDL's is a key point. As each is a strategic site they are not directly competing in market terms given their geographic location, rather, are identified as being suitable for growth and their implementation essential in meeting the Council's growth strategy and wider aims and objectives of the plan. On this basis, they need to be allowed to come forward in parallel, with the draft policies focusing on the phasing of delivery of each site.
- 5.17. Further infrastructure, timing and delivery information is required within draft Core Policies 4,

5 and 6. It would assist the monitoring and implementation of the strategy, it would set the scene for the Site Allocations Development Plan Document (DPD) and it would accord with the guidance contained within PPS12 (paragraph 4.1) by setting out how much development is intended to take place where and when and by indicating by which means it will be delivered.

**Development tariff approach**

- 5.18. We note that draft Core Policy 12 proposes the introduction of CIL. On this basis and provided it is made clear what any Charging Schedule is intended to cover and how this will relate to securing the necessary infrastructure for delivery of the three SDL's, it is neither necessary or appropriate in accordance with the CIL Regulations (Regulation 122 and 123) to make provision for a local development tariff.
- 5.19. Furthermore, the CIL Regulations make it clear that where a CIL Charging Schedule is implemented, there is not then a requirement to prepare a Developer Contributions SPD.

## 6. Other Policy Specific Comments

### Section 4: Policy Influences

- 6.1. We welcome the reference at paragraph 4.6 to the Council's award of Growth Point status (confirmed July 2008), in particular, that the Council is continuing to strive to deliver its growth agenda in Stafford but recognising that individual proposals must be sustainable, environmentally acceptable and realistic in terms of infrastructure.
- 6.2. Paragraph 4.9 refers to the West Midlands Regional Spatial Strategy (RSS) which contains regional policies to direct new development between 2006 and 2026. The document suggests that regional policy was revoked in July 2011 through the Local Democracy, Economic Development and Construction Act 2009 and refers to the coalition government's intention to abolish regional spatial strategies through the Localism Act 2012.
- 6.3. For the avoidance of doubt and until such time that regional spatial strategies are abolished, the West Midlands RSS remains part of the statutory development plan for Stafford Borough Council (SBC). As set out in Section 3, in this instance, this should include the Phase Two Revision draft and subsequent Panel Report (September 2009) and the recommendations contained within.
- 6.4. The findings of the EiP Panel Report in so far as the apportionment of housing to Stafford, including the implications of the award of Growth Point status and proposals to increase the number of Army personnel based at the Ministry of Defence site in Stafford, remain a material consideration for the purposes of considering the emerging Core Strategy and growth strategy contained within.

### Section 5: Spatial Vision

- 6.5. Overall, we support the spatial vision for Stafford Borough, in particular, the Council's desire to grow Stafford Town, including diversifying its existing employment base and provide significant new high quality housing, to raise its overall profile in the local, regional and national market.

### Section 6: Key Objectives

#### Stafford: Objective 1

- 6.6. This deals with provision of housing in Stafford Town during the plan period, including the need to provide elderly persons accommodation and housing for military personnel. Land to the north of the town is identified for development in the short term, with land to the east and west identified for the medium term, subject to delivery of the proposed western and eastern

access improvement schemes.

- 6.7. We have a number of concerns about the current wording of this objective, as follows:

Mix of housing

- 6.8. The need to provide a mix of housing to meet local identified needs, including for elderly persons, is widely accepted as good practice in promoting schemes comprising residential development and is required by PPS1 and PPS3.
- 6.9. However, in terms of the requirement to provide accommodation for military personnel, the strategy is not clear where this is to be provided and how its provision relates to the overall housing requirements of Stafford Town.
- 6.10. At the time of the West Midlands RSS EiP, the Ministry of Defence (MoD) presented evidence to the Panel which suggested that at that time, it was unclear whether the MoD would seek to accommodate returning personnel within purpose built facilities (i.e. on site) or within the wider community. As a result, the Panel Report recommended that the housing requirement for SBC excludes any additional accommodation that might be required by the MoD during the plan period.
- 6.11. Recommendation R3.1 (page 87) of the Panel Report makes clear that the housing requirement for SBC should be 11,000 (at a rate of 550 dwellings per annum between 2006 and 2026) with potential for a further 1,000 additional dwellings for Defence Personnel related to Stafford. An extract of the Panel Report is enclosed at **Appendix 5**.
- 6.12. It is not clear whether this position has changed and, on this basis, the Core Strategy should differentiate between that housing which is required in market terms (i.e. to meet local market and other identified needs) and that associated with the MoD's continued operations at their site in Stafford which is yet to be quantified or confirmed.

Timing of and direction for delivery of growth

- 6.13. In terms of prioritising the direction of growth, development to the north seems to take precedent over that which might come forward to the east or west of Stafford Town. However, on the basis that development to the east and west is expected to deliver significant highways infrastructure; the need to promote a balanced housing market and address local identified needs; the Council should be promoting growth in each of these locations in parallel to ensure the overall housing requirements can be met and the necessary supporting infrastructure delivered in a timely manner.
- 6.14. There is a good synergy between the provision of employment to the north in the short term, with housing in the north and east in a similar timeframe.

**Stafford: Objective 4**

- 6.15. This seeks to secure early delivery of new employment land to the east of Stafford in the short term. This is contrary to 'Stafford: Objective 1' in terms of timing and delivery if development to the east of the town as a whole is being phased back and, in any event, is tied to delivery of the eastern access improvement scheme (as identified at Stafford Objectives 1 and 11) and this in itself is dependent on adjacent land being brought forward for development to subsidise its provision.
- 6.16. We would draw your attention to our detailed comments on the delivery of each of the proposed extensions to Stafford Town in **Section 4**.

**Stafford: Objective 11**

- 6.17. The principle of Objective 11 is supported, subject to further information being provided within the Core Strategy setting out the full extent of proposals for the Eastern Access Improvement Scheme, including its proposed alignment; the phasing and timing of its delivery; and, how its implementation relates to development proposals to the east of Stafford Town. This approach equally applies to the Western Access Improvement Scheme.

**Section 8: Policies****Core Policy 11: Planning Obligations**

- 6.18. The draft policy should be revised to build in some flexibility to take account of the viability of a development and its ability to deliver improved infrastructure, services, facilities etc, in determining whether planning permission should be granted or not. Whilst it is important that developments are adequately mitigated, there are often a number of other material factors which need to be taken into account by the Council in determining applications.

**Core Policy 12: Community Infrastructure Levy (CIL)**

- 6.19. Further information is required with regards what the proposed CIL is likely to cover and, in particular, to clarify with regards draft Core Policies 4, 5 and 6 what infrastructure is required and where, the timescales for its delivery tied to development of, in particular, the SDL's and viability of its implementation.

**Core Policy 13**Sustainable Construction

- 6.20. Draft Core Policy 13 seeks to ensure that all new residential development achieves at least a four star rating under the Code for Sustainable Homes by 2013, and that all residential development is carbon neutral by 2016 (Code Level 6). In terms of non-residential development of up to 1,000 sqm, this will be expected to have a BREEAM Very Good rating, whilst developments of greater than 1,000 sqm will be expected to have a BREEAM

Excellent rating.

- 6.21. Whilst it is important that the Council strives to achieve sustainable construction in new developments, the ability of a scheme to achieve the sustainable homes or BREEAM ratings specified will need to be considered on a site by site basis in terms of the suitability and viability of a scheme in achieving such ratings.
- 6.22. In terms of the requirement for all new developments to generate a proportion of their energy requirement from on site renewable resources or low carbon energy equipment, it would be helpful if the Council specified precisely what proportion of the projected energy demands of a development are required to be met on site so that this can be factored in early on in the development process.
- 6.23. Notwithstanding this, we welcome the Council's recognition in the draft policy wording that flexibility needs to be applied where a site cannot viably meet this requirement and/or it is technically or environmentally impractical to source renewable energy on site.

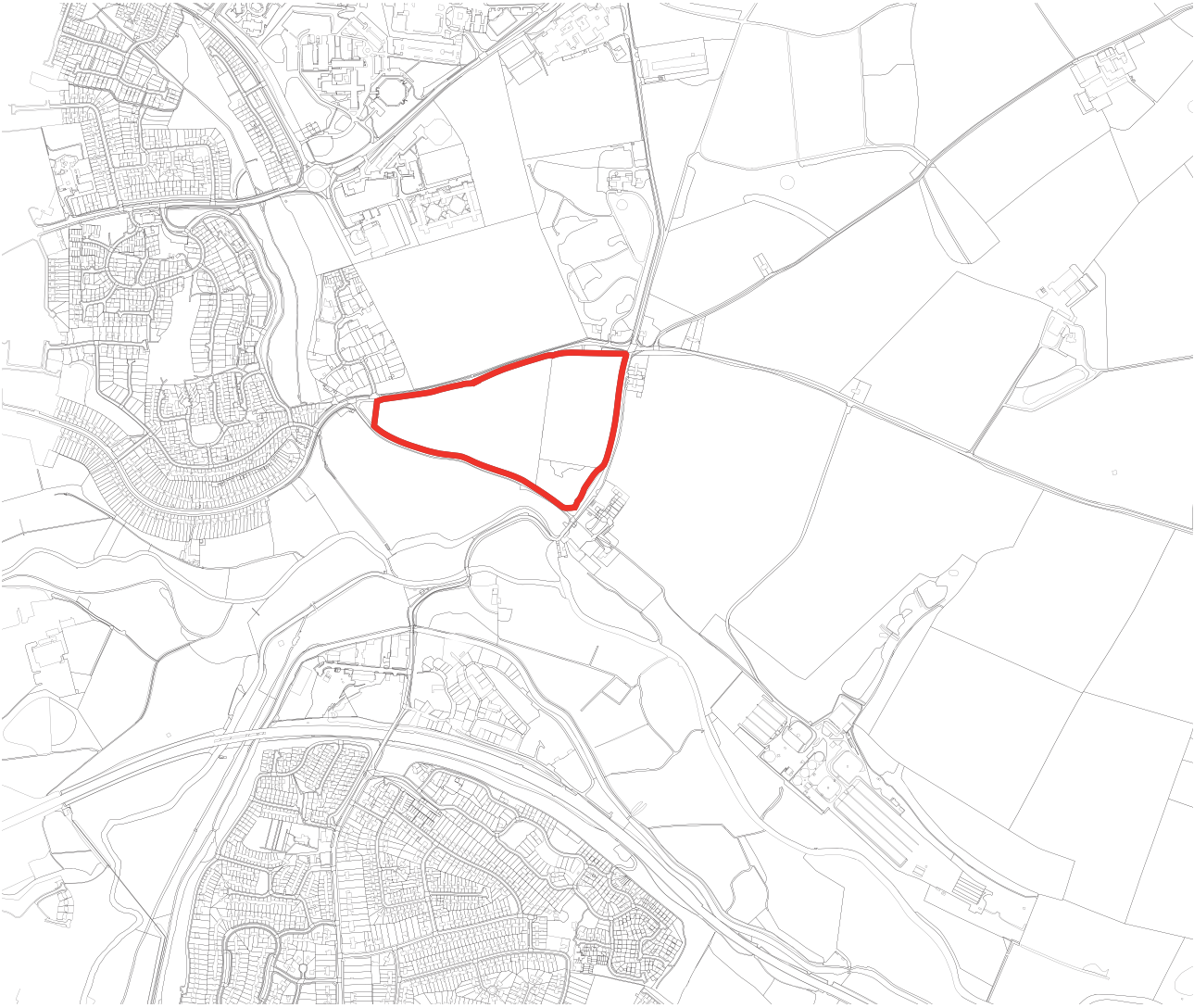
#### **Core Policy 19: Affordable Housing**

- 6.24. The delivery of affordable housing is essential to securing a balanced housing market across the Borough, however, the need to secure 30% affordable housing on larger sites needs to be balanced the cost of delivery of other social and physical infrastructure and borne in mind when determining applications for development.
- 6.25. In particular, we note from the findings of the Council's study into the Economic Viability of Housing Land (Levvel, July 2011) that the viability of development of land to the east of Stafford Town (identified as Value Area 5 – ST18 0 in the report) is 'more challenging' with delivery likely to be 'up to 30%' rather than 30% as a minimum.
- 6.26. We welcome the Council's recognition that affordable housing provision will need to be considered against the viability of schemes on a case by case basis.
- 6.27. For clarity, it would be helpful if the Council identified which of those settlements have populations either less than or above 3,000 and/or the dataset from which this information is to be based, so that it is clear what thresholds are applicable to sites, particularly outside of Stafford and Stone.





# Appendix 1



**Site Location Plan**





Forward Planning Team  
Stafford Borough Council  
FREEPOST (MID 12091)  
Stafford  
ST16 3BR

**By email and post**  
**forwardplans@staffordbc.gov.uk**  
Our ref. BD/SW/192105

22 February 2008

Dear Sirs

### **THE PLAN FOR STAFFORD BOROUGH – THE BOROUGH WIDE DEVELOPMENT STRATEGY CONSULTATION**

We write to submit representations to the Borough Wider Development Strategy Discussion Paper which has been published for consultation.

We act on behalf of the Commercial Estates Group (CEG) who is seeking to promote the development of land at Tixall Road at the eastern boundary of the urban area of Stafford (see attached Site Location Plan).

Stafford requires new land for development to meet its strategic housing and economic growth objectives and requirements under emerging planning policy. This site is a significant opportunity to assist the Borough in achieving its development targets. It is deliverable and available for development and is capable of contributing towards meeting Stafford's strategic growth objectives in the short to medium term.

#### **The Strategy**

The emerging Regional Spatial Strategy (RSS) Phase Two Revision for the West Midlands promotes a step change in housing and employment development in the borough between 2006 and 2026, with proposals for the annual housing land requirement in Stafford to increase from 373 dwellings to 518 dwellings. Furthermore, Stafford is identified as a Settlement of Significant Development (Policy CF2) with new development being promoted in and adjacent to the urban area in seeking to provide for the economic and social needs of the area and complementing the role of the Major Urban Areas (MUA's) within the region.

The Borough Wide Development Strategy presents a number of alternative development strategies for accommodating new growth and development over the plan period. CEG supports the promotion of Options A and B which seek to focus the majority of new development into the principal urban areas of Stafford and Stone. Stafford is the main County town and Options A and B will also support its promotion as a Settlement of Significant Development; assist in attracting new investment and development in accordance with regional planning policy; and, in meeting local housing, employment and regeneration

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needs through the promotion of sustainable brownfield and greenfield development opportunities.

In identifying the parameters for development within the emerging strategy, there is a need to ensure the promotion of sustainable patterns of development with new housing and employment development located within close proximity to existing services and facilities. PPS3 (Housing) sets out a sequential approach to new housing development, which favours previously developed land set at accessible urban locations, ahead of development on greenfield sites. However, in identifying new housing sites it encourages local planning authorities to identify deliverable sites which are available for development, suitable for the creation of mixed-use communities and achievable in terms of housing being delivered within the next five years.

We understand that the Council has commenced work on its Housing Land Availability Assessment (HLAA) which will establish the availability of brownfield and greenfield sites for development and form part of the evidence base for the emerging Core Strategy. This site should be considered as part of the HLAA in support of the emerging growth strategy.

Whilst it is greenfield its development is sequentially preferable ahead of less sustainable sites and should be identified for development, based on its sustainability credentials as set out below, and its synergy with the surrounding urban area.

The development of this site would form a sustainable extension to the eastern boundary of the urban area of Stafford that accords with the criterion identified within PPS3 in determining the suitability of sites as follows:

- The site is available for development to meet short and medium term housing land requirements;
- It is suitable for residential redevelopment as it is a sustainable greenfield site adjacent to the urban area of Stafford;
- It lies in an accessible urban location with good access by public transport, walking, cycling, and lies close to the town centre, shops, facilities and employment;
- It has good synergy with surrounding development and will complement new growth and development on the eastern boundary of the urban area, including, Staffordshire Technology Park; RAF Stafford and Staffordshire University; and
- The site can enhance existing environmental assets to create a good housing and/or mixed-use environment.

CEG are committed to promoting the site for development and its development would support the Council's emerging growth strategy and assist in the delivery of new housing in Stafford.

We understand that the land to the north of Tixall Road is also being promoted for development by First City and whilst our client's site could be promoted in isolation, there might also be an opportunity it as part of a wider development scheme.

### **Conclusion**

There is a requirement for significant amounts of land for new housing and employment to be identified. This site represents a significant development opportunity on the periphery of the urban area of Stafford and is capable of assisting the Council in meeting their emerging housing land requirements in the short to medium term. Its promotion for development supports the emerging growth strategy for Stafford and will assist in meeting the Council's strategic growth requirements and overall vision for the future.

CEG is committed to supporting the growth and development of Stafford and is actively seeking to promote development adjacent to the main urban area. We believe that development should be focused within the main urban area of Stafford and, in developing this strategy, there is a need to consider both brownfield and sustainable greenfield development opportunities.

We request that due consideration is given to this sustainable greenfield development opportunity in meeting future development requirements and reserve our right to comment further in due course to future drafts of the core strategy.

Yours faithfully



Sarah Williams

Enc: Site Location Plan  
Response Form





Forward Planning  
Civic Centre  
Riverside  
Stafford  
ST16 3AQ

**By email and post**  
**forwardplanning@staffordbc.gov.uk**  
Our ref. SW/BD/192105

3 April 2009

Dear Sir/Madam

**Delivering the Plan for Stafford Borough – Issues and Options**

We write to submit representations to the *'Delivering the Plan for Stafford Borough – Issues and Options'* Consultation which is currently being undertaken.

We act on behalf of Commercial Estates Group (CEG) who currently has a number of land interests in the Borough including land to the east of Stafford at Tixall Road (see attached Site Location Plan). Discussions have been ongoing with regard to bringing forward an application for residential led development in this area to help meet Stafford's short to medium term need and deliver new housing in accordance with RSS requirements and the Growth Point.

Comments have been provided on the Response Forms. These representations are submitted further to comments made in response to *'Delivering a Borough Wide Development Strategy'* (dated 22 February 2008).

We would welcome the opportunity to discuss these representations with officers to help inform the emerging strategy for the Borough and the Council's Preferred Option, to be identified later this year.

In the meantime, should you have any queries please do not hesitate to contact us.

Yours faithfully

Sarah Williams

Enc: Response Form

cc: Commercial Estates Group

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**Also in London, Leeds and Dublin**



'Delivering the Plan for Stafford Borough - Issues and Options' Response Form

## 'Delivering the Plan for Stafford Borough - Issues and Options' Response Form

Please specify the question, paragraph number or location option your comments relate to

Paragraph 3.6/3.7 Stafford

Please provide your comments below

The only way in which to achieve 7,000 new high quality houses is through significant urban extensions (especially if the Growth Point is factored in). This should be recognised in the Stafford vision/objectives section.

# 'Delivering the Plan for Stafford Borough - Issues and Options' Response Form

If you require additional space for your response, please photocopy this form.

**Please provide your name and address below. If you are an agent acting on behalf of a client, please specify.**

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**E-mail address**

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Thank you for taking the time to provide your comments. All comments will be taken into account when producing the Preferred Options for the *Plan for Stafford Borough* later this year. Please return this form to the following address, ensuring receipt by **12 noon on Friday 3rd April 2009**:

Forward Planning  
Civic Centre Riverside  
Stafford  
ST16 3AQ

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## 'Delivering the Plan for Stafford Borough - Issues and Options' Response Form

### 'Delivering the Plan for Stafford Borough - Issues and Options' Response Form

Please specify the question, paragraph number or location option your comments relate to

Paragraph 6.26

Please provide your comments below

The Council's Strategic Housing Land Availability Assessment (SHLAA) Final Report identifies a number of sites both within and outside of existing Residential Development Boundaries. In addition, reference is made to sites already identified within the planning process and that all of these sites are considered by the Council to be deliverable, with a potential yield of 3,141 houses.

Although the identification of sites in the SHLAA does not imply that they will be made available for housing or granted planning permission for development, the Council's consideration of their existing housing land supply is not robust as it includes a number of sites with extant consent which have only outline permission and also sites which are in excess of five years old that have not delivered housing even in economic buoyant times.

With regard to the identification of a potential yield of circa 13,000 dwellings on other SHLAA sites, it is unclear how this figure has been derived and whether it takes into consideration realistic developable land areas to account for provision of new infrastructure, open space etc.

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'Delivering the Plan for Stafford Borough - Issues and Options' Response Form

## 'Delivering the Plan for Stafford Borough - Issues and Options' Response Form

Please specify the question, paragraph number or location option your comments relate to

Paragraph 6.29 (Green Box)

Please provide your comments below

The Council has identified that a development strategy based on Option C might be preferable i.e. with new development focused on the County Town of Stafford, the market town of Stone and either one or more of the principal settlements.

We support the identified approach to the spatial strategy as this will enable Stafford Town to be expanded and developed in accordance with the approach outlined in emerging West Midlands RSS (Preferred Option December 2007), and the Council's Growth Point Programme of Development (PoD) submitted by the Council to Government in October 2008.

# 'Delivering the Plan for Stafford Borough - Issues and Options' Response Form

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'Delivering the Plan for Stafford Borough - Issues and Options' Response Form

## 'Delivering the Plan for Stafford Borough - Issues and Options' Response Form

Please specify the question, paragraph number or location option your comments relate to

Paragraph 7.3

Please provide your comments below

Section 7 identifies two potential growth scenarios relating to the requirements for development in the Borough between 2006 and 2026. Option 1 is based on the emerging West Midlands RSS (Preferred Option December 2007) with Option 2 reflecting the potential growth requirement for the Borough as identified in the Nathaniel Lichfield & Partners Study (October 2008) undertaken in support of the emerging RSS.

Option 1 should be identified as the absolute minimum, as this level of growth is necessary in meeting Stafford's growth needs and aspirations for development and overall vision for how the Borough is to develop.

Option 2 should be revised upwards or a third option introduced, to reflect the Nathaniel Lichfield research (to 13,300 dwellings). This would also reflect the proposed uplift in new housing which is required as a result of the Growth Point status of Stafford Town and build in some flexibility for the potential expansion of the MoD Stafford site and its associated requirements, should proposals to create a Super Garrison (as identified at paragraph 4.55) to come forward in the future.

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'Delivering the Plan for Stafford Borough - Issues and Options' Response Form

## 'Delivering the Plan for Stafford Borough - Issues and Options' Response Form

Please specify the question, paragraph number or location option your comments relate to

Paragraph 7.4

Please provide your comments below

In accordance with Paragraph 6.29 and growth Option C, the promotion of development in the identified settlements is consistent with the proposed approach. However, as set out in emerging RSS, the policy should be clear that the focus for the majority of growth is within Stafford, with growth in Stone and the Rural Areas more limited.

# 'Delivering the Plan for Stafford Borough - Issues and Options' Response Form

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'Delivering the Plan for Stafford Borough - Issues and Options' Response Form

## 'Delivering the Plan for Stafford Borough - Issues and Options' Response Form

Please specify the question, paragraph number or location option your comments relate to

Paragraph 7.5

Please provide your comments below

In accordance with Paragraph 6.29 and growth Option C, the promotion of development in the identified settlements is consistent with the proposed approach. However, as set out in emerging RSS, the policy should be clear that the focus should be on the majority of growth being located within Stafford Town, with growth in Stone and the Rural Areas more limited.

# 'Delivering the Plan for Stafford Borough - Issues and Options' Response Form

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'Delivering the Plan for Stafford Borough - Issues and Options' Response Form

**'Delivering the Plan for Stafford Borough - Issues and Options' Response Form**

Please specify the question, paragraph number or location option your comments relate to

Paragraph 7.13/Scenario Options 1

Please provide your comments below

See attached sheet

# 'Delivering the Plan for Stafford Borough - Issues and Options' Response Form

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**Please provide your name and address below. If you are an agent acting on behalf of a client, please specify.**

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**Please specify your contact preference**

*(please tick one answer)*

- Email.....
- Post.....
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## Paragraph 7.13/Scenario Options 1

The proportionate split of proposed housing and employment development as set out in this table is not clear with the top of each identified range for housing provision exceeding the total requirement (10,100 dwellings/12,100 dwellings respectively). With regard to indicative employment provision, even if provision at the top of each range is provided, there remains a shortfall of 10 hectares.

Whilst the overall proportionate approach broadly aligns with the approach to locating development in identified settlements (as set out at paragraphs 7.3 and 7.4) there remains a heavy reliance on sites in Stone and the Rural Area coming forward for development to meet the emerging RSS requirements (both in housing and employment terms).

With regard to the potential housing land requirement, the targets expressed in emerging RSS are not a 'maximum'. As such, there is the potential to consider increasing the provision of development in and around Stafford Town (above 7,000 dwellings) to facilitate its growth and economic improvement, without detriment to the urban area of Stone and/or the other identified settlements. In this respect, the Council's SHLAA – Final Report identifies a range of sites to the north, east, south and west of Stafford Town to meet the growth of this area.

In respect of employment provision, whilst it is acknowledged that some small scale employment development will be required to support growth in Stone and within existing employment areas in the smaller settlements, it is not clear where circa 20 hectares of employment development would be accommodated elsewhere in the Borough.

Further clarity is required in terms of the Council's assumptions in preparing this table and the overall rationale behind the approach.

This table should also be updated to set out how growth might be accommodated were the Nathaniel Lichfield proposed housing requirement (13,300) to be endorsed by Government Office.

To assist, we have prepared a similar table setting out an alternative approach to the proportionate split of new housing and employment (reflecting on a potential third option), for consideration by the Council (see below).

*Table 1*

	<b>Settlement/Locality</b>	<b>Minimum Growth Scenario</b>	<b>Minimum Higher Growth Scenario</b>	<b>Higher Growth Scenario to reflect NLP Study</b>
<b>Housing</b>	Stafford	7,000	9,000	10,000
	Stone	1,500	1,750	1,750
	Eccleshall, Hixon, Gnosall, Great & Little Haywood	1,000	700	800
	Haughton, Weston & Woodseaves	200	200	200
	Yarnfield & Tittensor Major Developed Sites in the Green Belt	250	250	350
	Remaining Villages	150	200	200
<b>Employment</b>	Stafford	55	55	55
	Stone	10	10	10
	Recognised Industrial	5	5	5

	Estates at Hixon, Raleigh Hall and Ladfordfields			
	<b>Total Required</b>	<b>10,100 Dwellings (net) 120 Hectares Employment</b>	<b>12,100 Dwellings (net) 120 Hectares Employment</b>	<b>13,300 Dwellings (net) 120 Hectares Employment</b>

This approach to dispersion of new growth across the Borough would better accord with Option C (paragraph 6.29) and enable the growth of Stafford Town in accordance with emerging RSS and the Growth Point.



'Delivering the Plan for Stafford Borough - Issues and Options' Response Form

## 'Delivering the Plan for Stafford Borough - Issues and Options' Response Form

Please specify the question, paragraph number or location option your comments relate to

Paragraph 8.4

Please provide your comments below

The Council suggests that any proportionate split should reflect the Council's existing identified forward supply of housing in terms of the location of sites with extant consents and identified SHLAA sites.

We have reviewed the previous supply in detail and note that development over recent years has been disproportionate with a significant proportion of development coming forward in the form of one and two dwelling proposals on relatively unsustainable sites in the rural area. Whilst in quantitative terms this has helped the Council to meet its housing land targets, it has resulted in relatively few sustainable sites coming forward in Stafford Town which have been able to contribute towards the growth needs of the principle urban area and deliver supporting infrastructure and affordable housing requirements.

Furthermore, the existing commitments at April 2008 cannot be relied on to deliver completions because of the economic climate. The figures should be adjusted down to reflect this. Figures published by the NHBC (April 2009) state new build completions in the combined public and private sectors is down 32% than the same period a year ago.

On this basis, the Council's current committed supply of sites should only be considered in so far as identifying where there remain a number of dwellings potentially in the pipeline, and not in influencing patterns of development, overall numbers and locations for growth in the future.

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'Delivering the Plan for Stafford Borough - Issues and Options' Response Form

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Please specify the question, paragraph number or location option your comments relate to

Paragraph 8.11 (Table regarding areas SF-1 to SF-12 inclusive)

Please provide your comments below

This table identifies projected dwelling numbers within the broad locations identified for housing development.

We have reviewed the detailed maps and associated assessment information provided through the Council's consultation website ([http://www.addresssafe.com/Stafford\\_PlanOptions.aspx](http://www.addresssafe.com/Stafford_PlanOptions.aspx)) and note that the information relating to areas SF-3 and SF-4 is unclear.

For the avoidance of doubt, area SF-4 should be identified as 'Land north and south of Tixall Road' and not 'Land west of Baswich Lane' as it is currently. The references in the table should read as follows:

SF-3 'Land west of Baswich Lane' (800)  
SF-4 'Land north and south of Tixall Road' (700)

As a consequence, the Council should review and amend the information provided in the accompanying assessments for these areas (Location Details and Characteristics, Environment and Landscape, Transportation and Access, New Development Requirements and Economic Development Considerations).

With regard to the information contained within these assessments, in respect of the current analysis of SF-3, reference should be made to the adjacent reserved alignment of the Eastern Distributor Road.

We would also comment that as currently set out for area SF-4, access to area SF-3 is currently excellent to both the A518 and A513. With regard to the highway impact of development in this area, as currently identified with regard to SF-3, this would increase the number of vehicles on Tixall Road, Weston Road and Blackheath Lane. However, the principle impact would be related to traffic travelling into the town (west) and onto the A513.

In accordance with our comments provided in respect of Spatial Option 1 in the absence of the proposed Eastern Distributor Road, elements of the land at SF-4 could be developed with access from Tixall Road as an early stage to assist meeting the RSS housing numbers.

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## 'Delivering the Plan for Stafford Borough - Issues and Options' Response Form

Please specify the question, paragraph number or location option your comments relate to

Paragraph 8.14

Please provide your comments below

The consultation document should identify whether any joint studies with South Staffordshire are currently being undertaken to establish whether delivery of land in this area can be achieved and the realistic timeframe, which is highly unlikely to be anything but the long term.

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**'Delivering the Plan for Stafford Borough - Issues and Options' Response Form**

Please specify the question, paragraph number or location option your comments relate to

Paragraph 8.15

Please provide your comments below

Parts of SF-3 could be delivered without the need for the Eastern Distributor Road.

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'Delivering the Plan for Stafford Borough - Issues and Options' Response Form

## 'Delivering the Plan for Stafford Borough - Issues and Options' Response Form

Please specify the question, paragraph number or location option your comments relate to

Paragraph 8.16

Please provide your comments below

The Council states that development to the west of Stafford Town has been identified through the LDF evidence base, including the Council's Traffic Model, as being the most sustainable location for new development.

We understand that the Council's Traffic Model (otherwise known as the SATURN Model) is still being progressed with a final report not expected until April/May 2009. On the basis that this work is still ongoing, it is unclear why the Council has concluded that land to the west of the town is the most sustainable location for new development. This should be tested through the LDF process.

Notwithstanding this, on the basis that the Council is already promoting development in this area and is in the process of developing proposals for the western access link which is required to facilitate access, it is worth noting that development of land to the west in isolation cannot deliver the housing and employment needs of Stafford Town in the short and medium term. The Council needs to take a comprehensive approach to development and locations for growth and consider the promotion of land in a number of locations, to ensure that a steady stream of development is being provided to meet emerging RSS requirements in accordance with PPS3. In this respect, land at Tixall Road should be supported for early delivery.

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'Delivering the Plan for Stafford Borough - Issues and Options' Response Form

## 'Delivering the Plan for Stafford Borough - Issues and Options' Response Form

Please specify the question, paragraph number or location option your comments relate to

Paragraph 9.18 (Code for Sustainable Homes)

Please provide your comments below

It is not appropriate for planning policy to be stipulating that new homes achieve or exceed a specified minimum level target expressed. Such requirements should be dealt with through Building Regulations at the design stage. This stance has been endorsed by a number of recent appeal decisions.

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## 'Delivering the Plan for Stafford Borough - Issues and Options' Response Form

Please specify the question, paragraph number or location option your comments relate to

Paragraph 9.31 (Residential Density)

Please provide your comments below

As set out, PPS3 promotes the efficient use of land and buildings and suggests a national minimum density of 30 dwellings per hectare.

We consider that the Council's approach to density of development should accord with national and regional planning guidance, however, there should be some flexibility on a site by site basis to enable consideration of other material factors i.e. landscape impacts etc.

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Please specify the question, paragraph number or location option your comments relate to

Paragraph 9.37 to 9.41

Please provide your comments below

PPS 3 (Para. 23) encourages developers to bring forward proposals for market housing which 'reflect demand'. Developers have clear assessments and understanding of market demand and should be discussed with the authority at the application stage.

In paragraph 9.39 of the Issues and Options document the Council question the number of 4 bed plus houses required in the future. We draw the Councils attention to the Strategic Housing Market Assessment 2007, paragraph. 12.10.5 which states:

*'In terms of house type, Stafford has a well balanced supply of different forms of stock, although there might be a slight oversupply of smaller terraces and apartment'.*

In relation to housing mix the Council should ensure there continues to be a flexible balanced mix of housing types built in the Borough.

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## 'Delivering the Plan for Stafford Borough - Issues and Options' Response Form

Please specify the question, paragraph number or location option your comments relate to

Paragraph 9.70

Please provide your comments below

Stafford is a diverse authority ranging from urban area of its larger towns such as Stafford to more rural locations.

The Council should apply a flexible approach to the provision of affordable housing. Any affordable housing requirement policy needs to address and relate to development costs, reduced values and affects upon viability, which will make 'affordable' provision as set out in a strict policy difficult to achieve and prevent some schemes coming forward.

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'Delivering the Plan for Stafford Borough - Issues and Options' Response Form

## 'Delivering the Plan for Stafford Borough - Issues and Options' Response Form

Please specify the question, paragraph number or location option your comments relate to

Paragraph 9.158

Please provide your comments below

Reference is made here to the proposed Eastern and Southern Distributor Roads. Subject to the outcome of the SATURN Modelling work being undertaken by Staffordshire County Council, should a requirement for either of these routes be identified, they should be identified within the emerging strategy and their alignment protected accordingly.

However, any proposed alignment should be based on a sound evidence base and work should be undertaken to demonstrate that the proposed alignment is the best option and that there are no possible deliverable alternatives.

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## 'Delivering the Plan for Stafford Borough - Issues and Options' Response Form

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Paragraph 9.159

Please provide your comments below

The Council considers that the western access route should be protected but does not justify why. As set out in response to paragraph 9.158, the need to reserve a proposed route should be demonstrated through the Council's evidence base and the current SATURN Modelling which is being undertaken.

Any proposed alignment should be based on a sound evidence base and work should be undertaken to demonstrate that the proposed alignment is the best option and that there are no possible deliverable alternatives.

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**'Delivering the Plan for Stafford Borough - Issues and Options' Response Form**

Please specify the question, paragraph number or location option your comments relate to

**Stafford (SF) Housing and Employment Location Options – Spatial Option 1 (Blue Box)**

Please provide your comments below

See attached sheet

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## **Stafford (SF) Housing and Employment Location Options – Spatial Option 1 (Blue Box)**

Spatial Option 1 identifies potential growth locations around Stafford Town, grouped to the north, east, south and west of the urban area forming urban extensions to the town.

We have considered each of the broad areas identified and provide comments as follows:

### North (incorporating SF1, SF2, SF-a, SF-b, SF-g, SF-h and SF-i)

This area has been identified by the Council as having the potential to deliver circa 3,800 new dwellings and 61 hectares of employment land. The landscape character type is Settled Farmlands and is of moderate to high sensitivity.

The area benefits from direct access to the M6, A513 and A34 and has reasonable transport links making it suitable and more attractive for employment uses. Development of this area for employment generating would also build on the critical mass of existing employment land already in place.

Subject to the outcome of the SATURN modelling work currently being undertaken by Staffordshire County Council, it is likely that local highway improvements would be required to accommodate the traffic generated from the identified quantum of development.

In accordance with the information contained at paragraph 9.2 of the Issues and Options document, there is also a need to consider carefully the scale of residential development to the north of Stafford Town so as not to prejudice development in Stone and/or the regeneration of North Staffordshire. For all these reasons, the balance of development to the north of Stafford should be weighted to deliver a greater proportion of employment land.

### East (incorporating SF3, SF4, SF5, SF-c and SF-d)

This area has been identified by the Council as having the potential to deliver circa 1,850 new dwellings and 22 hectares of employment land. This is the area in which CEG has its principle interests with the aforementioned site forming part of area SF-4.

This area extends south east from the University along the elevated escarpment north of the River Sow valley, as far as Lodge Covert and Brancote Farm. Tixall Road subdivides the area, together with Hanyards Lane. The Staffordshire Landscape Guidelines define this landscape character type as Sandstone Estatelands, a gently rolling, featureless landscape where the increasing intensification of arable farming has led to almost complete destruction of the fabric of the landscape. In overall terms, this area is of low to moderate sensitivity.

Landform consists of a shallow bowl falling gently towards Stafford in the west. A shallow ridgeline runs north south from Lower Hanyards through Lodge Covert and down to the Swimmings woodland due north of the Sow. This combines with existing woodland blocks to provide robust containment and separation from Tixall and the wider countryside to the east.

At its western end, the area is crossed by the protected line of the proposed Stafford Eastern Distributor Road (Council Ref: SF-PR1) which, if constructed, would provide a local highway link between A513 Beaconside to the north with A513 Milford Road to the south. The road is not currently included in the Highway Authority's programme of improvement schemes and its future will be informed by the outcome of the SATURN modelling work currently being undertaken by Staffordshire County Council. Development of the land in the form of a significant mixed use urban extension would provide the opportunity to secure some private sector contributions to help deliver the Eastern Distributor Road.

In the short term and in the absence of the link road, elements of the land could be developed with access from Tixall Road, with local mitigation measures to the existing highway network.

Land in this eastern area is therefore suitable and deliverable in the short, medium and longer term. In particular, the triangular area of land at the western end south of Tixall Road site could provide circa 250-300 dwellings in the short to medium term as a part of identified area SF-4 and is unconstrained.

In the medium and longer term, additional land can be developed to the east (i.e. in area SF-3) to provide a future supply of housing and mixed uses in this area beyond 2016. This will complement other potential urban extensions to the north and west. Delivery of the early phases are not dependent on significant new infrastructure requirements and can be developed through a comprehensive and sustainable approach.

#### South (incorporating SF6, SF7, SF8, SF9, SF10 and SF-e)

This area has been identified by the Council as having the potential to deliver circa 3,300 new dwellings and 14 hectares of employment land.

This area extends from the southern fringe of Walton on the Hill round to Acton Hill to the south of Wildwood and has few landscape features of note.

The area is crossed by the protected lines of the proposed Stafford Eastern Distributor Road, and the Southern Bypass. If constructed, the roads would provide a local highway link between A513 Beaconside to the north with M6 junction 13 to the south. The road is not included in the Highway Authority's current programme of improvement schemes but development of the land could provide an opportunity to secure private sector contributions to deliver the Eastern Distributor Road in phases.

Limited development might be achievable in the short to medium term as, in the absence of the link road, elements of the land could be developed with access from Cannock Road. A large scale urban extension, however, would be dependent on the link road and importantly, the agreement of the adjoining authority in whose boundary it lies. We note that the recently published South Staffordshire Core Strategy Preferred Options paper does not currently promote this area for development.

For these reasons, development of land in this area should only be considered as a medium to longer term option.

#### West (incorporating SF11, SF12 and SF-f)

This area has been identified by the Council as having the potential to deliver circa 2,100 new dwellings and 4 hectares of employment land.

This area provides a largely undisturbed northern setting for Stafford Castle, which sits prominently at 144 metres on Castle Wood Hill. The Staffordshire Landscape Guidelines define the area as partly Settled Farmlands and partly Ancient Clay Farmlands and overall, the area is of moderate to high sensitivity in landscape terms.

Delivery of major development in this western area is dependant on the development of a link road to facilitate access into the site at a significant cost, requiring public and private sector funding. The link requires access over the railway which reduces the prospect of delivery in the short to medium term.

Whilst development to the west of Stafford Town could have benefits for this area as well as the

town itself, the realisation of the full area is subject to development of the proposed new link road (SF-PR3) and therefore this area should be considered as medium to long term option for development.





6.23 *The distribution of housing shown in Table 1 sets out how the Region will respond to the higher level of housebuilding required by the government. This distribution also reflects WMRSS and RHS objectives as well as sub-regional and local regeneration priorities. The table should be read in conjunction with policy CF4 on phasing. Within the MUAs, development will be of a scale that will enable these areas to increasingly meet their own generated needs. At 2006, the ratio of new housing development between the MUAs and other areas was 1:1.3. Proposals in Table 1 imply an average ratio of new development of 1:1.2 between the MUAs and the rest of the Region.*

6.24 *This level of new house building will require substantial investment from the private sector, including house builders and utility providers, as well as from the private sector in terms of transport and other supporting infrastructure. This infrastructure needs to be provided, as far as possible, at the same time as the housing development, as a necessary prerequisite of development.*

## CF3 Level and Distribution of New Housing Development

A. *Development plans should make provision for additional dwellings (net) to be built as specified in Table 1 for the period 2006-2026. Proposals for Birmingham, Solihull (that part within the MUA) and the Black Country Boroughs are minima figures. Table one also shows the indicative annual development rates necessary to achieve these targets.*

*In certain circumstances, the most sustainable form of housing development may be adjacent to the settlement but cross local authority boundaries. Where housing market areas cross local authority administrative boundaries, co-operation and joint working will be necessary to ensure that*

*sites are released in a way that supports sustainable development.*

*In the following locations, local authorities must jointly consider the most appropriate locations for development before producing or revising LDDs:*

- i) Birmingham and Bromsgrove in relation to Birmingham;*
- ii) Stoke-on-Trent and Newcastle-under-Lyme in relation to the North Staffordshire conurbation*
- iii) The four Black Country Boroughs in relation to Wolverhampton, Walsall, Sandwell and Dudley*
- iv) Stafford and South Staffordshire in relation to Stafford town*
- v) Cannock Chase, Lichfield and Stafford in relation to Rugeley*
- vi) Tamworth, Lichfield and North Warwickshire in relation to Tamworth and Lichfield Districts*
- vii) East Staffordshire and South Derbyshire in relation to Burton upon Trent*
- viii) Coventry, Nuneaton & Bedworth and Warwick in relation to Coventry*
- ix) Redditch, Bromsgrove and Stratford-upon-Avon in relation to Redditch*
- x) Worcester, Malvern Hills and Wychavon in relation to Worcester.*

*Footnotes to accompany Table 1:*

- a) Of the total provision for Birmingham, around 700 dwellings will be provided at Longbridge, in Bromsgrove District.*
- b) Dependant upon the capacity in Coventry and the outcome of further studies, some of the allocations could be made adjacent to Coventry within Nuneaton & Bedworth and Warwick Districts.*
- c) Of the figure of 8,000 for Lichfield, dependant upon the outcome of further local studies, some of the allocations could be made relating to Tamworth and Rugeley.*
- d) Dependant upon the outcome of further local studies, some of the Stafford town allocation could be made, adjacent to the settlement, in South Staffordshire District.*
- e) Redditch Figure of 6,600 includes 3,300 in Redditch and 3,300 adjacent to Redditch town in Bromsgrove and/or Stratford-upon-Avon Districts.*
- f) Of the figure of 10,500 for Worcester; 3,200 will be within Worcester City and 7,300 will be adjacent to the City within the surrounding districts of Malvern Hills and Wychavon.*
- g) Includes the Newcastle urban area.*



**Table 1 – Housing Proposals 2006 - 2026**

Planning Area	Proposal Total (Net) 2006 - 2026	Indicative Annual Average 2006 - 2026
Birmingham <sup>(a)</sup>	50,600	2,530
Coventry <sup>(b)</sup>	33,500	1,675
<b>Black Country</b>	<b>61,200</b>	<b>3,060</b>
Solihull	7,600	380
<b>Metropolitan Area Total</b>	<b>152,900</b>	<b>7,645</b>
<b>Shropshire</b>	<b>25,700</b>	<b>1,285</b>
Bridgnorth	2,500	125
North Shropshire	6,100	305
Oswestry	4,000	200
Shrewsbury and Atcham	8,200	410
of which Shrewsbury	6,200	310
South Shropshire	4,900	245
<b>Telford &amp; Wrekin</b>	<b>26,500</b>	<b>1,325</b>
of which Telford	25,000	1,250
<b>Staffordshire</b>	<b>54,900</b>	<b>2,745</b>
Cannock Chase	5,800	290
East Staffordshire	12,900	645
of which Burton upon Trent	11,000	550
Lichfield <sup>(c)</sup>	8,000	400
Newcastle-under-Lyme	5,700	285
of which Newcastle urban area	4,800	240
South Staffordshire	3,500	175
Stafford	10,100	505
of which Stafford town <sup>(d)</sup>	7,000	350
Staffordshire Moorlands	6,000	300
Tamworth	2,900	145
<b>Stoke-on-Trent</b>	<b>11,400</b>	<b>570</b>
<b>Warwickshire</b>	<b>41,000</b>	<b>2,050</b>
North Warwickshire	3,000	150
Nuneaton and Bedworth	10,800	540
Rugby	10,800	540
of which Rugby town	9,800	490
Stratford-on-Avon <sup>(e)</sup>	5,600	280
Warwick	10,800	540
<b>Worcestershire</b>	<b>36,600</b>	<b>1,830</b>
Bromsgrove <sup>(f)</sup>	2,100	105
Redditch <sup>(g)</sup>	6,600	330
Malvern Hills <sup>(h)</sup>	4,900	245
Worcester City <sup>(i)</sup>	10,500	525
Wychavon <sup>(j)</sup>	9,100	455
Wyre Forest	3,400	170
<b>Herefordshire</b>	<b>16,600</b>	<b>830</b>
of which Hereford City	8,300	415
<b>Shire and Unitary Authorities Total</b>	<b>212,700</b>	<b>10,635</b>
Major Urban Areas <sup>(k)</sup>	169,100	8,455
Other Areas	196,500	9,825
<b>West Midlands Region</b>	<b>365,600</b>	<b>18,280</b>



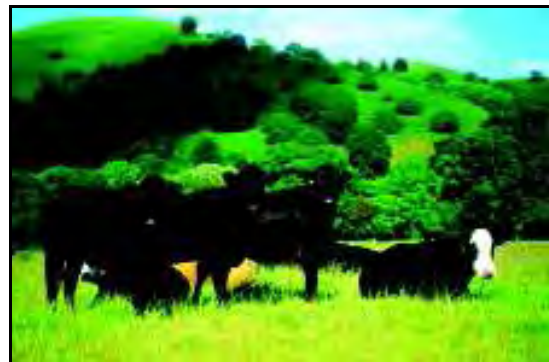
# West Midlands Regional Spatial Strategy Phase Two Revision

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**Report of the Panel: Volume 1 - Report**  
September 2009

**Examination in Public**  
28<sup>th</sup> April – 24<sup>th</sup> June 2009

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**Table 3.3 – Housing Proposals 2006-2026**

[All cross-boundary figures are consistently listed in the LPA from which they derive]

Planning Area	RSS PO (Net) 2006-2026	Panel (Net) 2006-2026	Increase	Comment	Chapter 8 para reference
<b>Birmingham<sup>1</sup></b>	<b>50,600</b>	<b>57,500</b>	<b>+6,900</b>	<b>Additional capacity substantially as identified by the LPA</b>	<b>8.13 – 8.18</b>
<b>Solihull</b>	<b>7,600</b>	<b>10,500</b>	<b>+2,900</b>	<b>Additional capacity substantially as identified by LPA</b>	<b>8.19 – 8.27</b>
<b>Black Country</b>	<b>61,200</b>	<b>63,000</b>	<b>+1,800</b>	<b>Additional capacity identified by LPAs</b>	<b>8.29 – 8.33</b>
<b>Coventry<sup>2</sup></b>	<b>33,500</b>	<b>33,500</b>			<b>8.34 – 8.42</b>
<b>WM MUA</b>	<b>152,900</b>	<b>164,500</b>	<b>+11,600</b>		
North Warwickshire	3,000	3,000			8.45
Nuneaton & Bedworth	10,800	11,000	+200	Rounding	8.43 – 8.44
Rugby	10,800	11,000	+200	Rounding	8.47
<i>Rugby</i>	<i>9,800</i>			<i>Indicative</i>	<i>8.48</i>
Warwick	10,800	11,000	+200	Rounding	8.49 – 8.53
Stratford-on-Avon <sup>3</sup>	5,600	7,500	+1,900	Additional capacity partially identified by the LPA	8.55 – 8.74
<b>Warwickshire</b>	<b>41,000</b>	<b>43,500</b>	<b>+2,500</b>		
Bromsgrove <sup>4</sup>	2,100	4,000	+1,900		8.85 – 8.87
Redditch <sup>5</sup>	6,600	7,000	+400		8.77 – 8.84
Wyre Forest	3,400	4,000	+600		8.88 – 8.89
Worcester City <sup>6</sup>	10,500	11,000	+500	Rounding of Core Option	8.91 – 8.101

<sup>1</sup> Around 700 to be in Longbridge AAP in Bromsgrove District.

<sup>2</sup> Around 3,500 to be in Nuneaton & Bedworth adjacent to the City boundary to the north near Keresley and around 3,500 to be within Warwick District adjacent to the City boundary to the south in the vicinity of Gibbet Hill/Finham.

<sup>3</sup> Further study should be undertaken in the context of a Core Strategy Review on the potential for sustainable provision of a further 2,500-3,000 dwellings for the 2021-26 period.

<sup>4</sup> Further study should be undertaken in the context of a Core Strategy Review on the potential for sustainable provision of a further 2,000-3,000 dwellings for the 2021-26 period.

<sup>5</sup> Around 4,000 within the Borough and around 3,000 in Bromsgrove District adjacent to the Redditch boundary.

<sup>6</sup> At least 3,500 will be in Worcester City, at least 3,500 in Malvern Hills adjacent the West boundary of the City and the remainder split between the City, Malvern Hills and

<b>Planning Area</b>	<b>RSS PO (Net) 2006-2026</b>	<b>Panel (Net) 2006-2026</b>	<b>Increase</b>	<b>Comment</b>	<b>Chapter 8 para reference</b>
Malvern Hills	4,900	5,000	+100	Rounding of Core Option	8.101
Wychavon	9,100	9,500	+400	Rounding of Core Option	8.101
<b>Worcestershire</b>	<b>36,600</b>	<b>40,500</b>	<b>+3,900</b>		
Cannock Chase <sup>7</sup>	5,800	6,800	+1,000	No actual increase within Cannock Chase given SAC issue only identification of cross-boundary requirement in Lichfield District.	8.108 - 8.110
South Staffordshire	3,500	3,500			8.107
Tamworth <sup>8</sup>	2,900	4,000	+1,100	Little actual increase within Tamworth Borough but that total should be regarded as a minimum to be exceeded if possible mainly identification of cross-boundary requirement in Lichfield District.	8.111 - 8.114
Lichfield	8,000	8,000		Although unchanged this represents an increase of around 2,000 as Cannock Chase and Tamworth requirements now identified separately. It should allow proper long-term consideration of N of Lichfield/Fradley.	8.115 - 8.121
East Staffordshire	12,900	13,000	+100	Rounding only as cannot count Drakelow provision and provision also made instead at N of Lichfield/Fradley.	8.122 - 8.125
<i>Burton-on-Trent</i>	<i>11,000</i>	<i>11,000</i>		<i>Indicative</i>	<i>8.125</i>
Stafford <sup>9</sup>	10,100	11,000	+900	NGP requirement	8.126 - 8.132

Wychavon Districts adjacent to or in the vicinity of the City as determined in the joint Core Strategy.

<sup>7</sup> Around 1,000 to be in Lichfield District adjacent to Rugeley.

<sup>8</sup> At least 1,000 to be in Lichfield District adjacent to north Tamworth.

Planning Area	RSS PO (Net) 2006-2026	Panel (Net) 2006-2026	Increase	Comment	Chapter 8 para reference
<i>Stafford</i> <sup>10</sup>	7,000	8,000	+1,000	<i>Indicative</i>	8.129
Staffordshire Moorlands	6,000	6,000			8.141
Newcastle-under-Lyme [rural part]	900	900			8.142
<b>Staffordshire other than North Staffs MUA</b>	<b>50,100</b>	<b>53,200</b>	<b>+3,100</b>	Adjusted to exclude North Staffs MUA.	
Newcastle-under-Lyme [MUA]	4,800	7,800	+3,000	Indicative assumption that extra 6,000 post 2016 split evenly. No rounding given short-term market fragility and need for Core Strategy DPD Review.	8.140 – 8.142
Stoke-on-Trent	11,400	14,400	+3,000	Indicative assumption that extra 6,000 post 2016 split evenly. No rounding given short-term market fragility and need for Core Strategy DPD Review.	8.140 – 8.142
<b>North Staffs MUA</b>	<b>16,200</b>	<b>22,200</b>	<b>+6,000</b>	<b>Increase post 2016</b>	
<b>Telford [Wrekin]</b> <sup>11</sup>	<b>26,500</b>	<b>26,500</b>			<b>8.134 – 8.137</b>
<i>Telford</i>	25,000	25,000		<i>Indicative</i>	8.137
<b>[Herefordshire]</b>	<b>16,600</b>	<b>18,000</b>	<b>+1,400</b>		<b>8.149 – 8.154</b>
<i>Hereford</i>	8,300	8,500	+200	<i>Indicative</i>	8.152
<b>Shropshire</b> <sup>12</sup>	<b>25,700</b>	<b>27,500</b>	<b>+1,800</b>		<b>8.143 – 8.148</b>
<i>Shrewsbury</i>	6,200	6,500	+300	<i>Indicative</i>	8.147
<b>Military [Households]</b>		<b>2,000</b>	<b>+2,000</b>		<b>8.130 – 8.132, 8.148</b>
<b>MUAs</b>	<b>169,100</b>	<b>186,700</b>	<b>+17,600</b>	46.25% [46.92%	
<b>Other areas</b>	<b>196,500</b>	<b>211,200</b>	<b>+14,700</b>	53.75% [53.08%	
<b>West Midlands Region</b>	<b>365,600</b>	<b>397,900</b>	<b>+32,300</b>		

<sup>9</sup> 1,000 additional for Defence Personnel related to Stafford on return from Germany separately listed. Subject to further studies part of the provision for Stafford may be provided in South Staffordshire District adjacent to the southern boundary of Stafford.

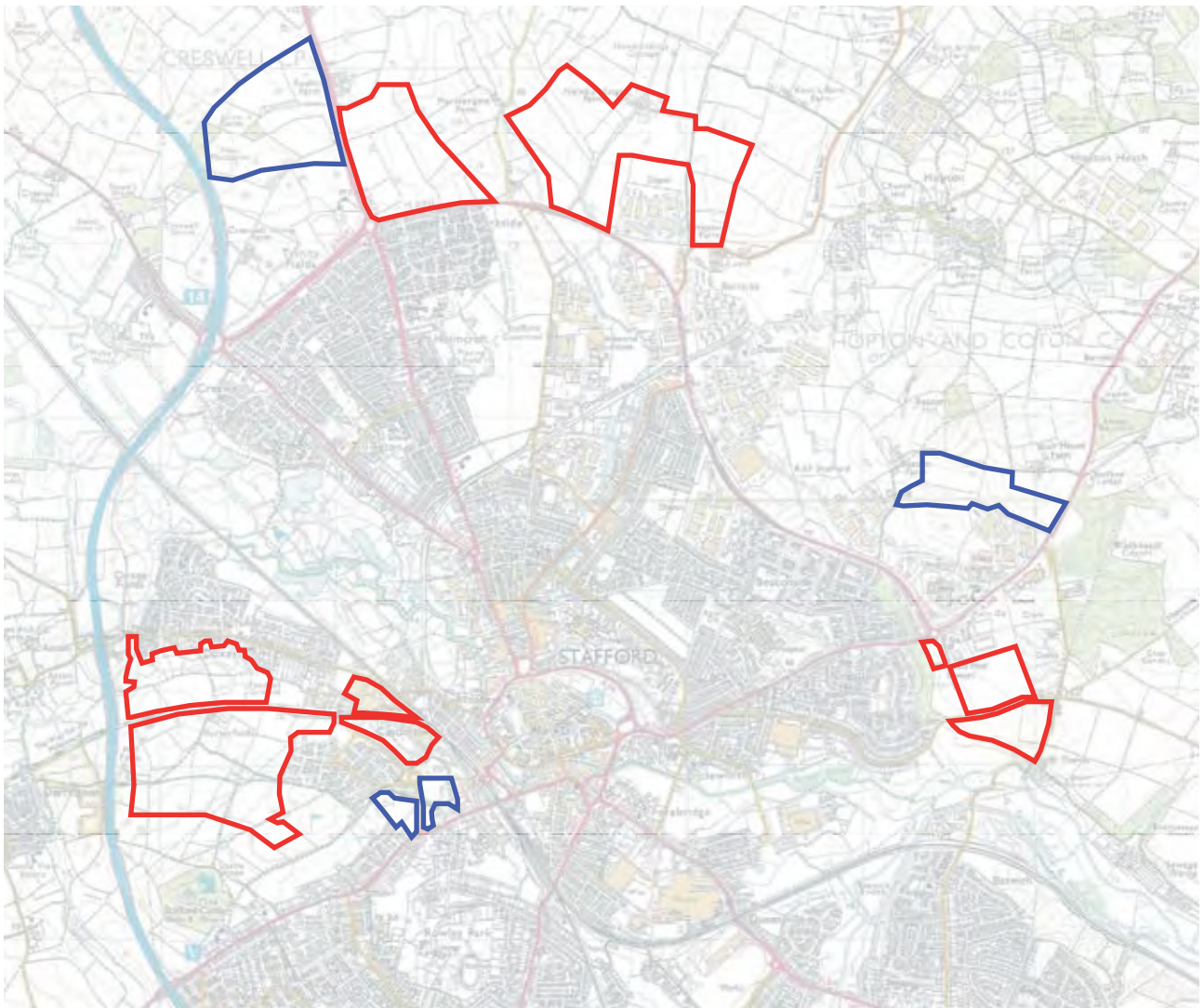
<sup>10</sup> See footnote 9 above.

<sup>11</sup> See footnote 12 below.

<sup>12</sup> 1,000 additional for Defence Households related to Cosford/Donnington on return from Germany separately listed.



## Appendix 6a

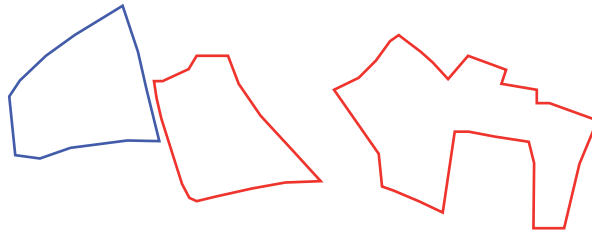


**Capacity Plan - Location of Growth Areas**

## Appendix 6b

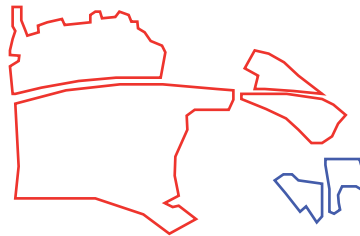
### Northern Extension

Net developable: 104.33h  
Estimated dwellings: 2200



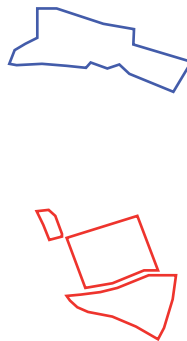
### Western Extension

Net developable: 95.33h  
Estimated dwellings: 2000



### Eastern Extension

Net developable: 24.66  
Estimated dwellings: 525



## Capacity Plan - Area Comparison





Stafford Borough  
Local Development  
Framework



# The Plan for Stafford Borough

Draft Publication

Consultation  
September & October 2011





## 8 Policies

### Core Policy 6

#### East of Stafford

Within the area identified East of Stafford a sustainable, well designed mixed use development will be delivered by 2031. Any application for development on a part or the whole of this area must be preceded by, and consistent with, a comprehensive Master Plan for East of Stafford including building Design Statements which have been agreed by the Council as a Supplementary Planning Document. Subject to a viability assessment the development must deliver the following key requirements:

- Phased delivery of up to 600 new homes, subject to provision of the Eastern Access Improvement Scheme, in a mix of housing types, tenures, sizes and styles with 30% being affordable housing in a mix of housing types, tenures, sizes and styles and a greater proportion will be 2 and 3 bedroomed properties;
- Provision to meet the needs of an ageing population through new extra care and specialist housing;
- The development takes place on a 'neighbourhood' approach with the provision of a mix of uses including local retail facilities, social and physical infrastructure (including provision to support new facilities at existing primary and secondary schools), health facilities and public open space;
- At least 20 hectares of new employment land at Beacon Hill with comprehensive links to existing and new housing development areas;
- Proposals relate to the whole Strategic Development Location or if less do not in any way prejudice implementation of the whole development;
- A comprehensive flood management scheme is essential to implement development at the East of Stafford Strategic Development Location including off-site measures to alleviate flooding and surface water management on the River Sow;
- The development should be based on maximising opportunities to use sustainable construction methods;
- The development should maximise on-site renewable or low carbon energy production including associated infrastructure to facilitate site-wide renewable energy solutions
- Existing hedgerows and tree lines to be retained and enhanced to support the provision of a network of green infrastructure including natural grasslands and woodlands, play areas, green corridors allowing wildlife movement and access to open space together with necessary measures to avoid and mitigate the impact of development on the Cannock Chase Special Area of Conservation including Suitable Alternative Natural Greenspace;
- An access and transport strategy is developed for the Strategic Development Location that maximises accessibility by non-car transport modes to Stafford town centre through walking and cycling connections, nearby existing and new employment areas, identifies access points to the site and between the site and the existing settlement, identifies construction access arrangements that do not disrupt existing residents and improvements to transport capacity along the A518 Weston Road in the vicinity of the University roundabout and along the Tixall Road;
- Delivery of the Eastern Access Improvement Scheme and associated transport improvements from Weston Road to St Thomas' Lane;
- Measure to conserve and enhance historic environment assets including St Thomas' Priory and landscapes such as Blackheath Covert;
- Protect nature conservation interests including Kingston Covert SBI;
- A clear hierarchy of roads (from distributor to home zones) producing discernable and distinctive neighbourhoods integrated and linked to existing areas.

A development tariff approach will be applied to all planning applications within the East of Stafford Strategic Development Location. The tariff will contribute towards the strategic infrastructure required to achieve a comprehensive sustainable development. Details of the development tariff will be set out in a future Developer Contributions SPD.

**Question 10**

Do you think that Land east of Stafford is a suitable and sustainable location? Please could you give use your reasons?

Do you agree with the infrastructure requirements we have outlined for Land east of Stafford? Have we missed anything?

**Location**

**8.40** Development to the east of Stafford are located between the A513 and the A518 comprising of housing sites delivering 600 new homes and one employment site delivering 20 hectares. A final decision on the identification of this Strategic Development Location will take place after this consultation exercise, taking into account responses received.

**Issues**

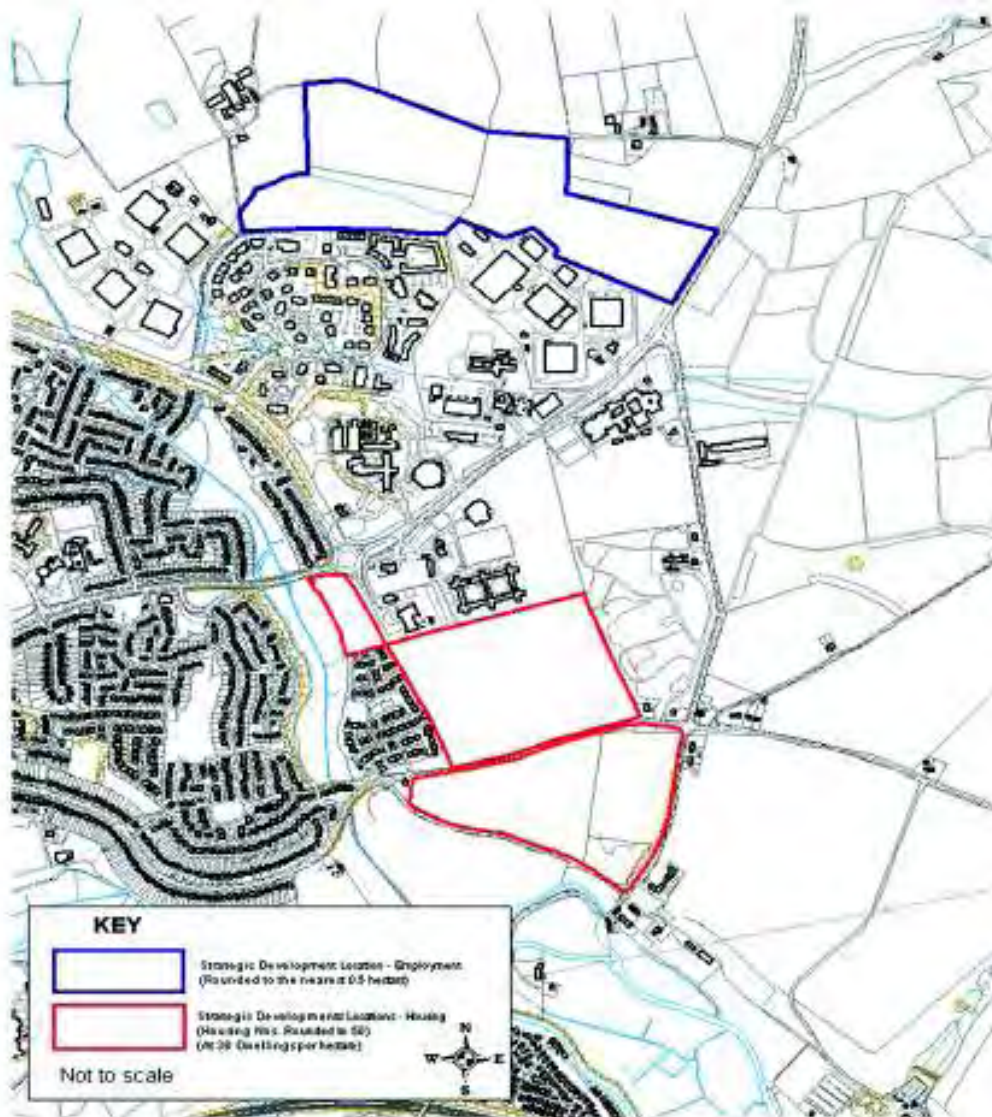
**8.41** The East of Stafford area is covered by a limited public transport service although there are opportunities for walking and cycling connections as the area is close to Stafford. A primary school is within 20-30 minutes walking distance of the area although the GP surgery and a secondary school are further away and as such would rely on public transport or the private car. There is the potential for linked trips by public transport into other areas of Stafford and further afield. The proposed new employment area is adjacent to the A518 and access will therefore have an impact on the junctions along the A518 towards Stafford town centre.

**8.42** Development to the east of Stafford will require a new waste water pumping station to be funded by developers. Reinforcement to the water supply network will be required together with provision of a local electricity sub-station. The East of Stafford area is within 3 kilometres of the Cannock Chase Special Area of Conservation which will require mitigation measures to be provided demonstrating the potential impacts have been fully addressed.

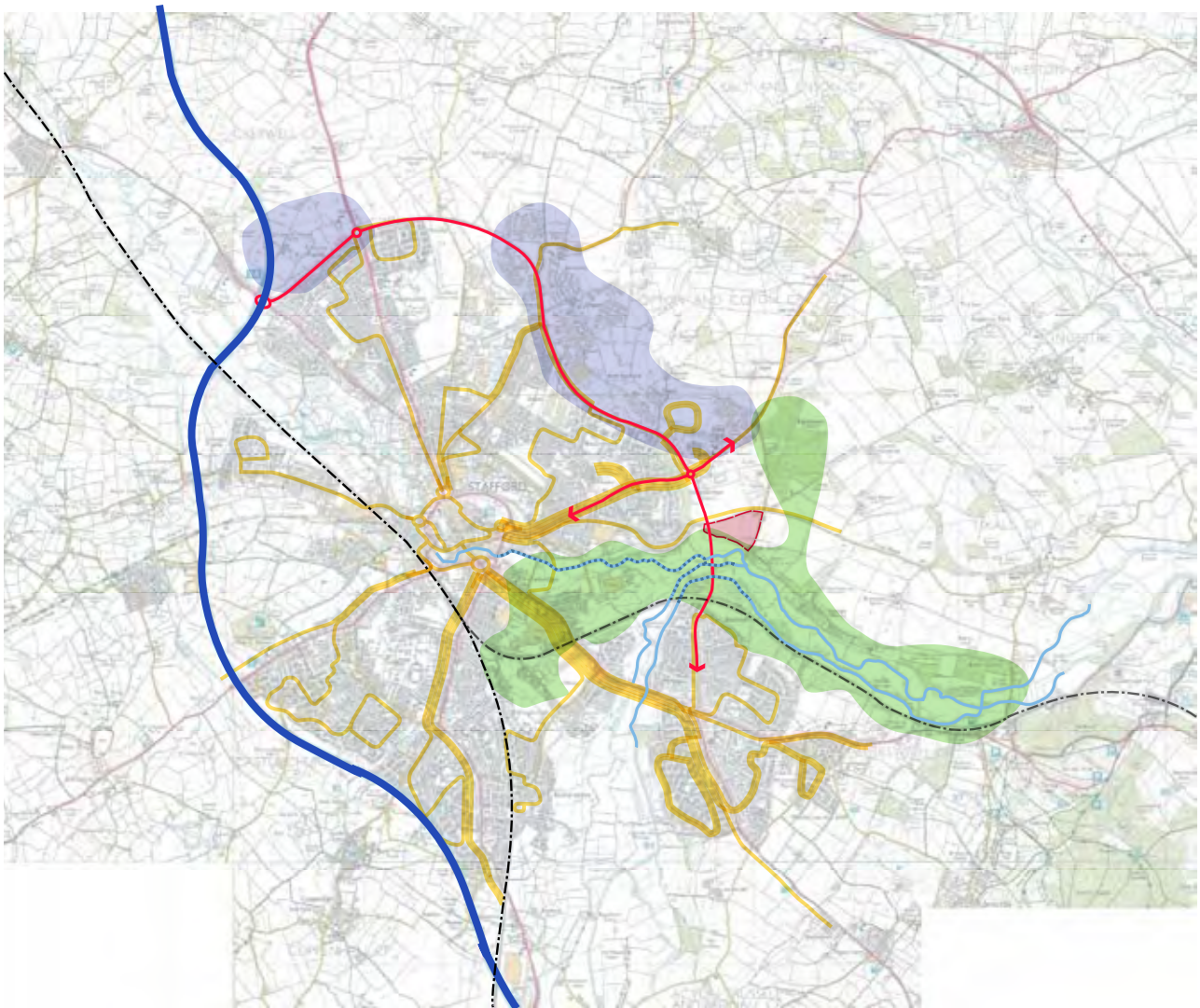
**8.43** Development in the East of Stafford area will need the Eastern Access Improvement Scheme to be delivered between Weston Road (A518) at its junction with A513 at Kingston Hill to the north and St Thomas' Lane linking to Milford Road (A513) to the south. An indicative route for a proposed Eastern Access Improvement Scheme is safeguarded in the Stafford Borough Local Plan 2001 but no detailed alignment is provided. Funding measures to prioritise public transport or support other smarter travel choices will need to be provided through development contributions as well as the Eastern Access Improvement Scheme. Further details are set out in the Stafford Borough Infrastructure Strategy.

## 8 Policies









### Development to the East of Stafford



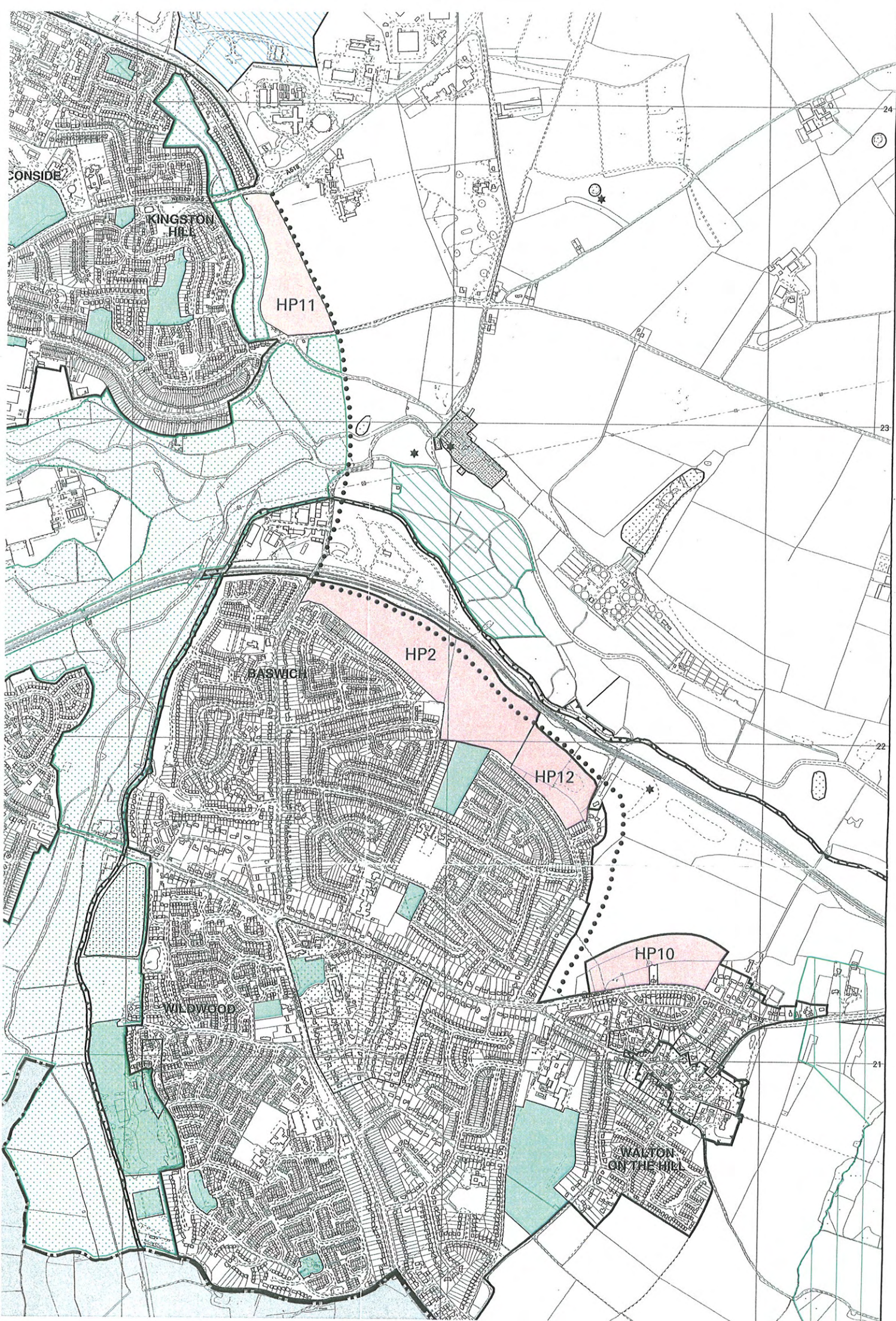




**Site Context Plan for Eastern Extension**

-  Site boundary
-  River and corridor
-  Railway
-  Motorway
-  Secondary road links
-  Districts
-  Bus routes (indicative)
-  Stafford riverway link





CONSIDER

KINGSTON HILL

HP11

HP2

BASWICH

HP12

WILDWOOD

HP10

WALTON ON THE HILL

24

23

22

21





Is it a key decision

N

**PORTFOLIO HOLDER DELEGATED DECISION****1. Portfolio Holder**

John Wakefield – Cabinet Member, Development

**2. Corporate Director's recommendation**

That the alternative protected route C of Stafford Eastern Bypass between the currently safeguarded line of Route G east of Baswich Lane and the A513 Milford Road be abandoned

**3. Applicable delegated power of Portfolio Holder**

General Delegations 1(a) to all Cabinet Members / Portfolio Holders

**4. Background**

See attached report

**5. Alternative options considered**

As set out in the attached report

**6. Resource and Value for Money implications**

As set out in the attached report

**7. Equal opportunities implications**

Nil

<b>8. Consultees</b>	<b>3</b>	<b>Date</b>
1. Corporate Director (Resources)	3	24 August 2005
2. Scrutiny Committee Chairman	3	24 August 2005
3. Local Member(s)	3	24 August 2005
4. Leader/Deputy Leader of Council	3	24 August 2005

**9(a) Portfolio Holder's decision**

That the alternative protected route C of Stafford Eastern Bypass between the currently safeguarded line of Route G east of Baswich Lane and the A513 Milford Road be abandoned

Signature ..... Date .....

**10. Background documents**

Report to Development Services Scrutiny Committee – 5 July 2000  
Staffordshire and Stoke-on-Trent Structure Plan 1996-2011

**11. Date notified to Corporate Director (Resources)**

Date.....

**If not urgent, decision may not be implemented until call-in period has expired**

**12. Call-in.....**

Call-in period ends (if not urgent)  
**(Corporate Director (Resources) to complete)**

Date:.....

Local Members Interest	
J. Barber	Stafford South-East
L. Bloomer	Stafford Trent Valley
V. Downes (Ms)	Penkridge

## **Portfolio Holder Delegated Decision**

---

### **STAFFORD EASTERN DISTRIBUTOR ROAD**

#### **Recommendations of Cabinet Member (Development):**

1. That the alternative protected Route C of Stafford Eastern Bypass, between the currently safeguarded line of Route G east of Baswich Lane and the A513 Milford Road, be abandoned.
2. That the Borough Council be notified of this change of policy and advised that the County Council will not be objecting to planning application 04/03301/FUL.

#### **Report of Corporate Director (Development Services)**

#### **PART A**

#### **What decision is required**

3. The purpose of this report is to seek approval to the abandonment of the protection of a section of Stafford Eastern Bypass – Route C. An alternative alignment, Route G, is presently protected in the adopted Local Plan (October 1998).

#### **Reasons for recommendations:**

4. The County Council has continued to protect two routes of Stafford Eastern Bypass between the A518 Uttoxeter Road and the A513 Milford Road. The bypass was re-designated as a distributor road in July 2000. The consequence of this is that the route is seen as a distributor road for local traffic rather than a bypass for longer distance through traffic. The two routes are known as Routes G and C and are shown on the attached plan. Route G, which is the historic alignment, has been protected for many years and is identified in the current Stafford Local Plan. Route C is presently only protected by the County Council as Highway Authority. This route affects two properties on Milford Road, one of which is currently the subject of a planning application. It is therefore opportune to review the status of this element of Route C.
5. In the context of the current Regional Transport Strategy, Local Transport Plan Guidance, and the Transport Strategy for Stafford, it is no longer considered appropriate to protect part of Route C of Stafford Eastern Bypass between Route G and the Milford Road. The continued protection of Route G is an issue that will no doubt be considered as part of the Local Development Framework (LDF) process. The LDF Core Strategy, Issues and Options Paper published in January 2005 makes no reference to the Eastern Bypass at present. However following discussions with Officers of the Borough Council it is understood that currently there is no need for the release of Greenfield land for housing and the Local Development

Scheme includes provision for the development of a Transportation and Access Development Plan Document. Preferred options are to be developed by March 2007. It is therefore not considered appropriate to blight property on the A513 Milford Road.

## **PART B**

### **Background:**

6. Proposals for an Eastern Bypass of Stafford have been under consideration for many years. The promotion of a planning application for Route G in the early 1990s caused considerable local concern, and prompted an investigation of alternative routes and a major consultation exercise in 1992.
7. A planning application was submitted for Route C between the A518 and the A34. This was considered by a Public Inquiry in January 1995 and the Secretary of State concluded that planning permission should be refused. This was partly as a consequence of the Inspector's concerns about the impact of the eastern section of Route C. However, the Inquiry into the Local Plan and subsequent Inspector's report concluded that Route G between the A518, and the A513 should be protected. The section between the A513 and A34 was not proposed for safeguarding.
8. A planning application for development adjacent to Old Croft Road, Walton-on-the-Hill on the continuation of Route G between the A513 and the A34 was objected to by the County Council at appeal on the basis of the County Council's protection of the route. This was lost as a consequence of the route not being identified in the adopted Local Plan in December 1999. Subsequently the County Council abandoned protection of this section of Route G, whilst still maintaining protection of Route C between the A513 and the A34 to the east of Walton-on-the-Hill.
9. The Staffordshire and Stoke-on-Trent Structure Plan 1996-2011, adopted in May 2001, includes Stafford Eastern Bypass – Uttoxeter Road (A518) to Rugeley Road (A513) as a scheme that is likely to require major funding by the private sector. No specific route is defined.
10. The County Council presently declares two routes on searches for the Eastern Bypass. The northern section of both is common. However, the routes diverge to the east of Weeping Cross. Route C affects two properties of which one (196 Main Road, Milford) is presently the subject of a planning application. The application was recommended for refusal on a number of highway grounds, one of which was its impact on Route C of Stafford Eastern Bypass. This application has been withdrawn pending the resolution of the issue.
11. As highway authority the County Council also protects a corridor for a Southern Bypass between the A34 and M6 Jct. 13. This will need to be similarly considered as part of the development of the Local Development Framework.

**Recommended option:**

12. In the context of the Regional Transport Strategy, Local Transport Plan Guidance, the emerging Local Development Framework and the Transport Strategy for Stafford, it is unlikely that Stafford Eastern Bypass will be constructed in the next ten years. There is currently no need at present for any additional greenfield development in the area, and Government Guidance advises that no more than one major scheme is likely to be approved in a Local Transport Plan period. Investment priorities in Stafford in the next five years are likely to focus on the Town Centre and the surrounding area including the railway station.
13. The continued protection of Route C north of Main Road, Milford affects two residential properties and blights them as a consequence. Given the experience of the Old Croft Road appeal referred to in paragraph 8, it is unlikely that the County Council would be able to resist a planning appeal on protection grounds as this route is not identified in the adopted Local Plan. Given the downgrading of the bypass to a distributor road it would be possible to utilise the existing A513 between Route G and Route C as the link though this passes between existing built-up residential areas on either side. This would avoid the need to construct a section of Route C and this section of the A513 has limited frontage access and already forms part of the Primary Route Network.
14. If and when the Stafford Eastern Bypass Scheme is promoted further it will need to be the subject of the appropriate consultation and environmental investigations. It is therefore recommended that the protection of Route C north of the A513 to the point where it joins the protected line of Route G cannot any longer be justified and should be abandoned. The long-term future of the remainder of the protected routes should be considered as part of the LDF process. This interim step will protect the option for future consideration.

**Other options available:**

**Equalities implications:**

There are no direct equalities implications arising from this report.

**Legal implications:**

A person whose land is effectively 'blighted' by future road proposals has the ability in law to serve a Blight Notice on the County Council requiring the County Council to compensate him or her for the loss in the value of his/her land as a result of the road proposals. If the property affected is that person's home and he/she is unable to sell it as a result of those proposals, he/she can also serve a Purchase Notice requiring the County Council to buy the property from him/her ?

**Resource and Value for Money implications:**

The continued protection of Route C north of the A513 could result in a Blight Notice.

**Risk implications:**

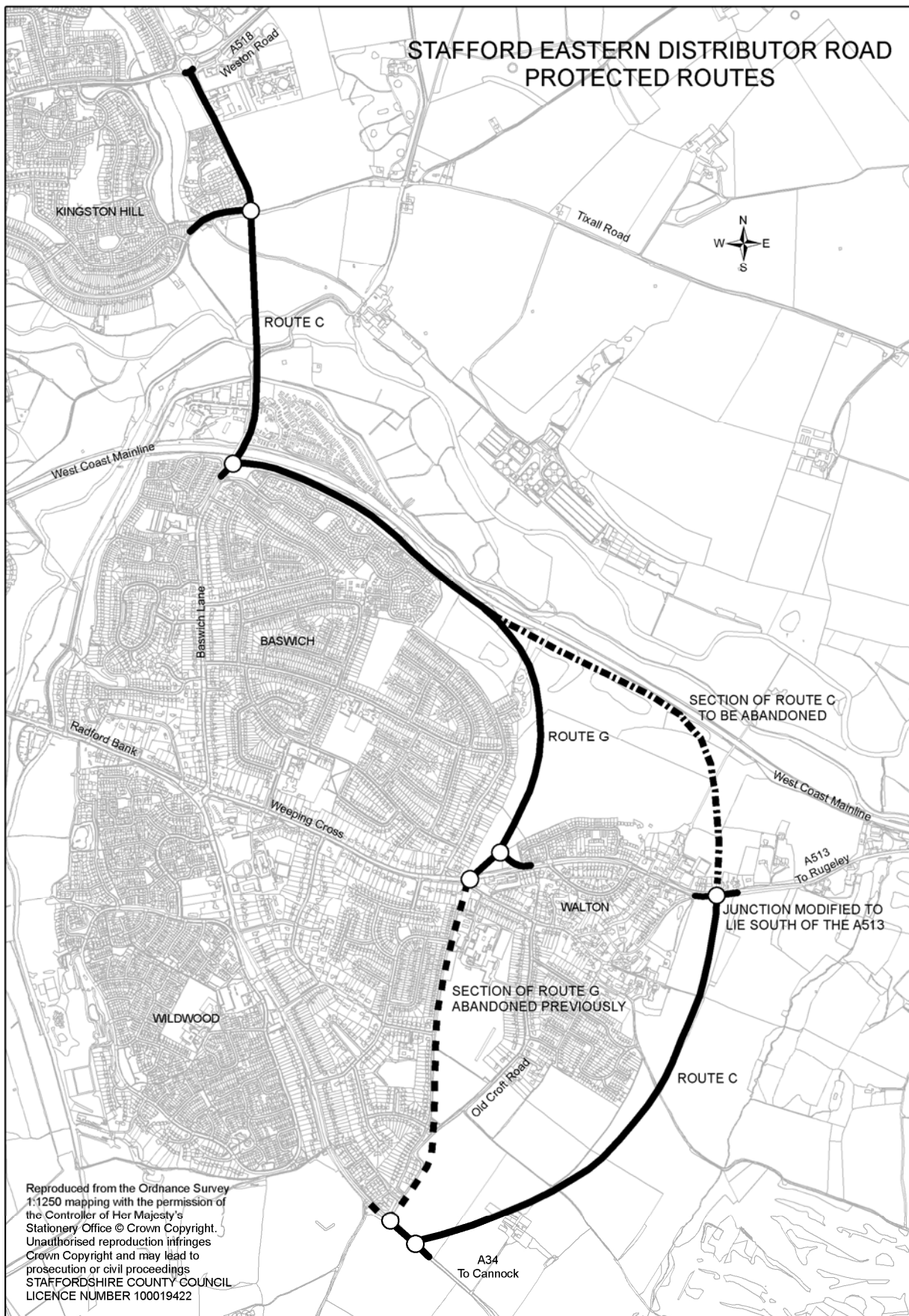
The proposed approach is intended to minimise risk.

**Report author:**

Author's Name: Peter Davenport  
Ext. No.: 6630  
Room No.: F6 (Development Services)

**List of background papers:**

Report of Development Services Scrutiny Committee – 5 July 2000.







Hewdon Consulting

LEVVEL **mm** Mott  
MacDonald



Stafford Borough Council

# Stafford Borough Infrastructure Strategy

July 2009

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Stage 1 Final Report

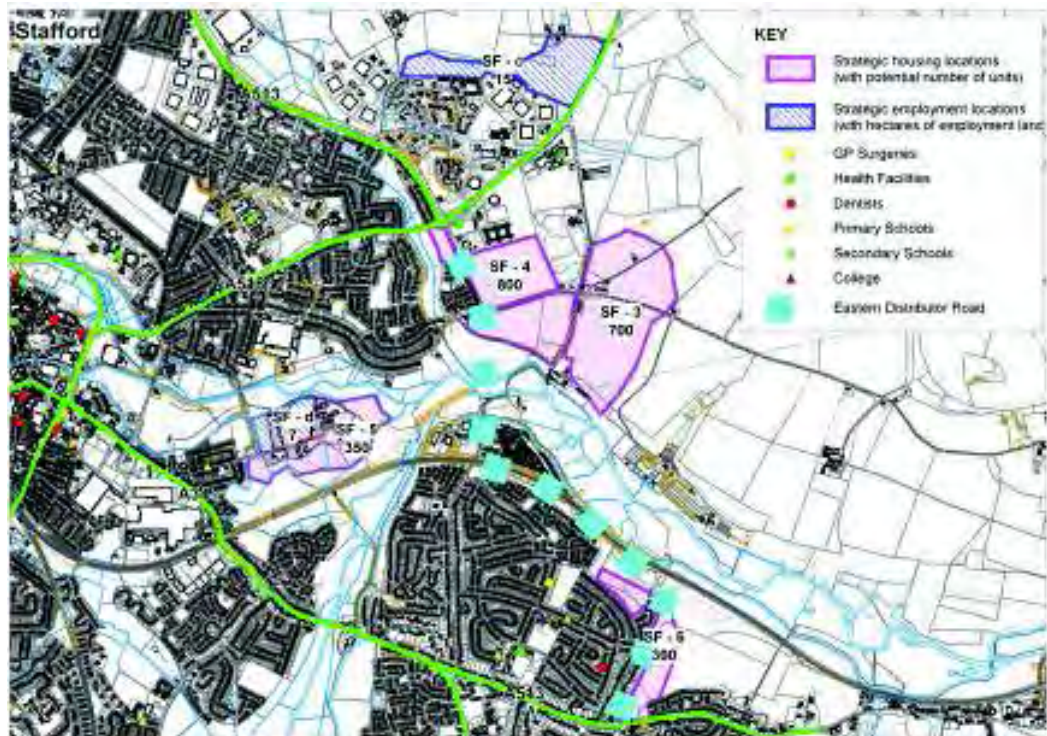
TRANSPORT  
TRAFFIC  
DEVELOPMENT  
PLANNING  
URBAN DESIGN  
ECONOMICS  
MARKET RESEARCH

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## 2.4 Eastern Direction of Growth

2.4.1 The potential development sites identified in the Eastern Direction of Growth are indicated in Fig.2.4 below.

Figure 2.4: Development Sites in the Eastern Direction of Growth

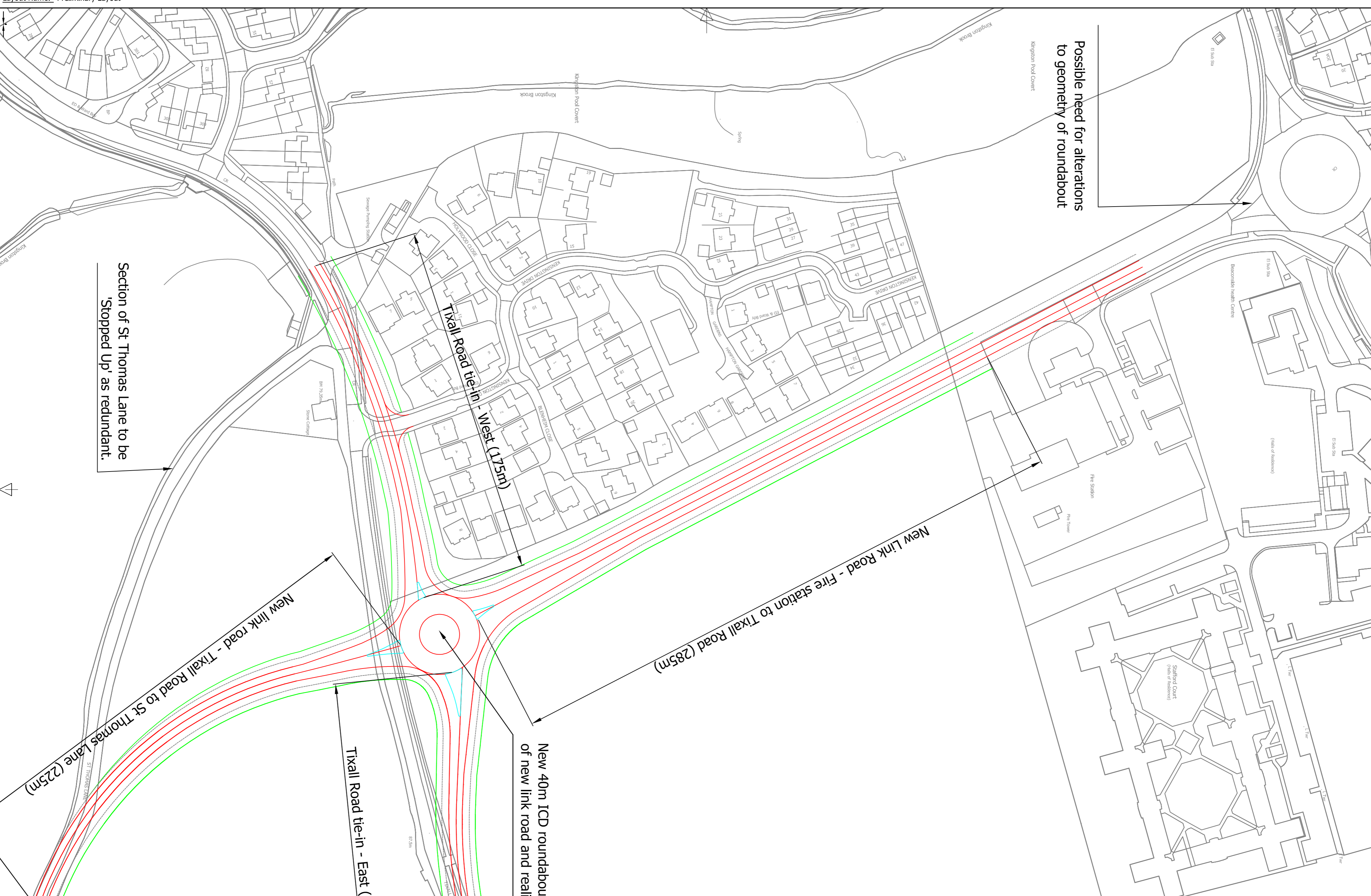


2.4.2 The key issues for infrastructure provision in the Eastern Direction of Growth are as follows:

- A new waste water pumping station would be needed, funded by developers. The critical issue here will be the lead time required to deliver this.
- Any significant development (over 200 units in this direction) will require investment in transport infrastructure. The LDF Core Strategy Issues and Options Paper indicates the need for an Eastern Distributor Road between the junction of Beacon Side (A513) and Weston Road (A518), and Cannock Road (A34) south of Walton on the Hill (where it would connect with the proposed Southern Distributor Road).
- All sites in the Eastern and Southern Directions of Growth are within 3km of Cannock Chase Special Area of Conservation (SAC), and their development is likely to be conditional upon demonstrating that the mitigation of potential impacts on the SAC have been fully addressed in accordance with the forthcoming Appropriate Assessment.

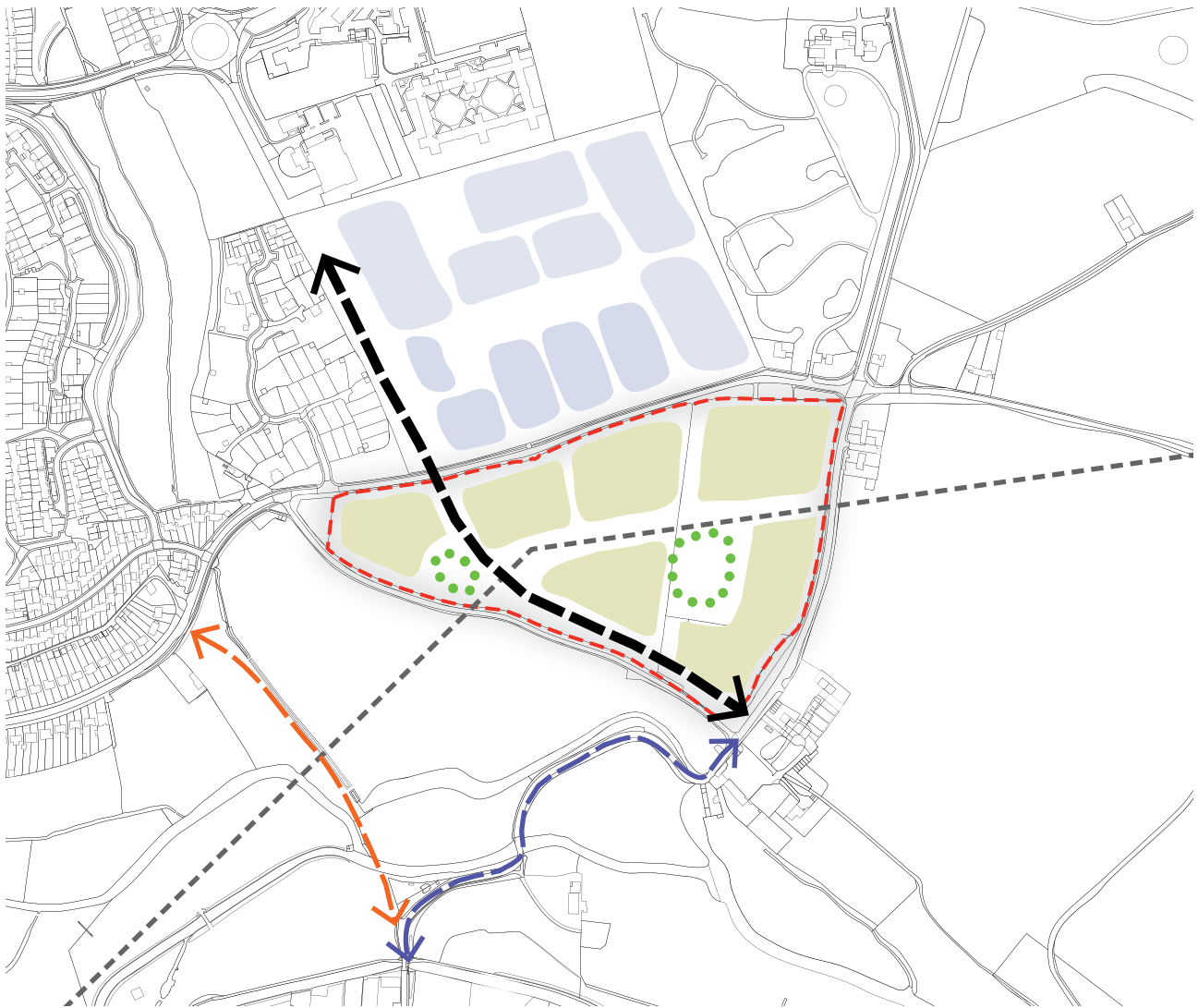
2.4.3 We have assessed the deliverability of this road north and south of Tixall Road.. At present, the north western section of a potential Eastern Distributor Road would meet the A513 at a roundabout at its junction with the A518. South of the roundabout there is a stub for the next section of road which currently only services a small complex of commercial buildings. If the road were built it would cross a field identified as a potential housing site (SF-4, 700 units) before reaching Tixall Road. Immediately to the west is a completed housing development with a single access onto Tixall Road. This development has a spine road allowing for expansion northwards – presumably dependent on the new





<p>STAFFORDSHIRE COUNTY COUNCIL,          HIGHWAYS,          RIVERWAY,          STAFFORD,          ST16 3JT</p>		<p><b>Stafford Eastern Access Improvements.</b>          Weston Road - St Thomas Lane</p>									
<p><b>Preliminary Layout</b></p>											
<p>Prepared   Produced   Checked</p>	<p>RDK   RDK   ND</p>	<p>Scale</p> <p>1:1250</p>	<p>Grid Reference</p> <p>SJ 945 235</p>								
<p>Date</p> <p>Oct 2010</p>	<p>Drawing No.</p> <p>CDT6459/R00/01</p>	<p>Size</p> <p>A1</p>	<p>Revision</p>								
<p>Revisions</p> <table border="1"> <thead> <tr> <th>Rev</th> <th>Date</th> <th>Detail</th> <th>By</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Rev	Date	Detail	By					<p>St Thomas Lane to be widened to 6.1m (230m)</p>		
Rev	Date	Detail	By								





**Link Road South-East**

This option develops the site on the basis of inclusion of a new link road that extends to the south-east across the site. This links into existing infrastructure and highways before crossing the river and railways.

- - - Site boundary
- - - Vehicle access
- ● ● Green area
- - - Gas line
- Land Reserved for future road
- Development
- North development
- Woodland
- - - Proposed new pedestrian and cycle way
- - - Highway improvements proposed by LA

**The Plan for Stafford Borough:  
Strategic Policy Choices Consultation  
June/July 2012**

Representations on behalf of  
Commercial Estates Group

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Strategic Policy Choices Consultation  
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Commercial Estates Group

July 2012

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# **The Plan for Stafford Borough: Strategic Policy Choices Consultation June/July 2012**

## Representations on behalf of Commercial Estates Group

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**The Plan for Stafford Borough:  
Strategic Policy Choices Consultation  
June/July 2012**

Representations on behalf of  
Commercial Estates Group

Appendices

**Appendix 1**  
Site Location Plan

# 1. Introduction

- 1.1. This Statement has been prepared on behalf of Commercial Estates Group (CEG) in response to Stafford Borough Council's (SBC's) Strategic Policy Choices consultation, which is currently being undertaken (June/July 2012).
- 1.2. CEG is promoting land to the east of Stafford Town for development. A site location plan is contained at **Appendix 1** which identifies the extent of CEG's land interests.
- 1.3. This includes a triangular parcel of land to the south of Tixall Road (bounded by St Thomas' Lane to the east and Baswich Lane to the south). This parcel, alongside the rectangular area land to the north of Tixall Road (being promoted by First City on behalf of the landowner), is currently subject to ongoing discussions with the Council in seeking to establish its combined scope for development, including in terms of quantum and mix of uses and delivery of infrastructure. This work is being undertaken jointly by CEG and First City in support of the Council's emerging Core Strategy.
- 1.4. The remaining land in CEG's control is not currently part of this work on the basis that it does not form part of the Stafford Eastern Extension proposals being promoted by the Council through its Core Strategy. Nonetheless, CEG has aspirations to see it developed in the longer term.
- 1.5. Therefore, whilst this Statement primarily concentrates on the latest consultation proposals in so far as they relate to proposals for the identified Stafford Eastern Extension promoted by the Council to date, regard is also had to the implications of the draft policies on the wider area of land also in CEG's control.
- 1.6. This Statement is submitted further to the comments provided in response to earlier consultations on the draft Core Strategy, in particular, the papers published in February 2008, March 2009 and October 2011. We have not sought to repeat comments previously provided, other than where it is appropriate in responding to the questions raised in this latest consultation document.
- 1.7. The following sections set out our response to the Strategic Policy Choices consultation paper, with reference to the guidance contained within the National Planning Policy Framework (NPPF) and with particular regard to:
  - the proposed scale of housing development;
  - apportionment to settlements; and
  - the distribution of housing and delivery of affordable homes.

## 2. Proposed Scale of Housing Development

- 2.1. Section 3 of the Spatial Policy Choices paper identifies the proposed scale of housing and employment development being planned for through the emerging Core Strategy (or Plan for Stafford as it is referred to by the Council).

### Proposed Plan Period

- 2.2. Paragraph 3.1 confirms the proposed plan period for the Plan will be 2011 to 2031, allowing for at least a minimum 15 year period from the date of adoption.
- 2.3. As set out in our previous representations (October 2011), this approach is supported provided that the plan is able to proceed to adoption shortly i.e. 2013.
- 2.4. Furthermore, in planning for housing development, the Plan should have regard to past delivery rates and any shortfall in housing delivery when assessed against the (current) targets contained within the Regional Spatial Strategy (RSS) in establishing a new baseline position for housing growth. Therefore, starting the Plan in 2011 is acceptable provided it has regard to what has happened previously and how any issues arising, might be addressed in the future. This approach is wholly consistent with the guidance contained within the NPPF.

### Level of Housing Provision

- 2.5. Paragraph 3.17 confirms that the Council is planning for delivery of approximately 500 dwellings per annum over the plan period (2011 to 2031) which equates to 10,000 new homes.
- 2.6. As set out in our previous representations (October 2011), this figure falls below the 11,000 target promoted by the Council through the Phase II Review of the West Midlands RSS and subsequently accepted in the Examination Panel Report (2009).
- 2.7. It also fails to reflect the Council's growth ambitions and award of Growth Point status and does not address the under delivery of housing in the previous years of the plan (particularly since 2009).
- 2.8. In this regard, we note that against the proposed RSS Phase II Revision target of 550 dwellings per annum (since 2006), as at the 31 March 2011 there had been a shortfall in delivery of 789 dwellings. This is likely to have been compounded by few completions in the 2011/12 monitoring period also, but the figure for this period is yet to be confirmed.
- 2.9. On this basis, the Council should be planning for delivery of at least 11,789 dwellings

reflecting on the past shortfall and need to cover at least a 15 year forward period.

- 2.10. So far, the Council is relying on evidence from the 2008 Office of National Statistics (ONS) population and household projections in supporting a figure of 10,000 dwellings over the plan period. Greater regard should be had to the Council's Strategic Housing Market Assessment (SHMA) and evidence put before the RSS EiP in 2008/9, in ensuring that the proposed housing target addresses housing need and household growth in the future.

## **Response to Questions 1 and 2**

- 2.11. As set out above, we believe that the Council should be planning for a greater level of growth than that currently set out i.e. a minimum of 11,789 dwellings between 2011 and 2031.
- 2.12. Furthermore, that the advantages/disadvantages identified in support of the Council's suggested figure of 500 dwellings per annum (or a total of 10,000 dwellings) are more applicable to a minimum figure of 11,789 dwellings, in particular, in terms of consistency with the approach of the RSS and the Council's own evidence base.
- 2.13. Additional benefits of this approach include a greater ability to secure infrastructure delivery (either improvements to existing and/or provision of new) and increased Homes Bonus funding which can assist both the Council and local communities which are pro-growth.
- 2.14. Contrary to the Council's reasoning, we do not believe that achieving this level of housing growth and need for release of greenfield sites will be to the detriment of brownfield regeneration within urban areas as suggested in the 'Disadvantages' section of Option 1. Conversely, there will be an even greater emphasis on the need for brownfield sites as well as greenfield release in meeting housing targets.
- 2.15. This is on the basis that, notwithstanding what we consider the overall housing requirement figure should be, how this housing target is met requires greater consideration by the Council.
- 2.16. To date, a large proportion of the Borough's requirement is being directed to the County town of Stafford (approximately 70%), an approach with which we agree. This equates to approximately 7,000 dwellings (based on the Council's figures) or 8,250 dwellings (based on our suggested requirement of 11,789 dwellings).
- 2.17. The Council suggests that based on existing commitments (a total of 3,077 dwellings across the Borough), it actually only needs to find 5,000 dwellings in Stafford Town over the plan period. In doing so, it is proposing three urban extensions of which Stafford East is the smallest having been identified for 600 dwellings. Work is ongoing by the promoters of each extension (in collaboration with the Council) to demonstrate deliverability of the proposed

extension areas and on the basis of the apportionment to each extension proposed by the Council.

- 2.18. In particular, the promoters of Stafford East (CEG and First City) are currently preparing a Development Statement which will confirm the deliverability of the Council's proposals for development in this location.
- 2.19. However, we strongly believe that not only should the overall Borough requirement be higher than 10,000 dwellings, the Council should be planning for more than 5,000 dwellings in Stafford Town. As a result, there is scope for Stafford East to accommodate more than 600 dwellings in the longer term with the current Stafford East proposal representing a first phase of a potentially larger scheme in the future.
- 2.20. As set out in Section 1, the current focus of discussions and the masterplanning work is on the Stafford East extension as defined in the Council's draft Plan (i.e. delivery of 600 dwellings) but mindful of our concerns regarding the Council's overall approach to housing growth and spatial distribution within Stafford Town, there is scope for a much larger extension to be identified in the plan and brought forward in the future.
- 2.21. Our position on the housing numbers remains unchanged from that set out in Section 3 of our Statement submitted in response to the October 2011 consultation on the draft Plan.
- 2.22. This considered the Council's housing figures as set out in the previous consultation draft and carried forward through the Spatial Choices Policy paper and reaffirms our view that the level of housing growth planned for in Stafford Town should be significantly greater than 5,000 dwellings, requiring additional land to be identified for development, in particular, supporting a greater extension to Stafford East.
- 2.23. In any event, the housing numbers expressed through the plan should be identified as minimum with the plan making provision for a buffer (at least 5%) to ensure delivery and in accordance with the NPPF.

### **3. The Sustainable Settlement Hierarchy**

#### **Response to Question 3**

- 3.1. We support the proposed Sustainable Settlement Hierarchy set out in the consultation paper on the basis that this reflects the importance of the County Town of Stafford, the role of Stone as a Market Town and identifies the most sustainable settlements in the rural area.
- 3.2. The approach is wholly consistent with the requirements of the NPPF to promote sustainable patterns of development and enhancing or maintaining the vitality of rural communities.

## 4. The Distribution of Housing Growth

### Response to Question 6

- 4.1. We support the apportionment of at least 70% growth to Stafford Town. This is consistent with the approach promoted by the Council at the RSS Examination and subsequently supported by the Panel; the growth ambitions of the Council and award of Growth Point status to Stafford Town; and, reflective of the role of the County Town of Stafford both within the Borough and wider Staffordshire County area.
- 4.2. As set out in Section 2 above, how this equates to the total amount of housing required in Stafford Town is still to be decided upon and it is our firm view that this should be greater than 5,000 dwellings as is being promoted by the Council.
- 4.3. In terms of apportionment to Stone, given that Stone is recognised as a Market Town and a sustainable location for new development, notwithstanding its relationship with the North Staffordshire Conurbation and regeneration initiatives underpinning growth in this particular area, the proposed distribution of housing is unevenly apportioned with a greater amount of growth being promoted in the rural area, in particular, the Key Service Villages.
- 4.4. Whilst the Key Service Villages might be sustainable locations for new growth and some development might be required to address local housing needs in those areas, this should not be to the detriment of growth and development in Stafford and Stone.

### Response to Question 7

- 4.5. One of the suggested disadvantages of focusing greater growth into Stafford Town relates to the potential impacts on existing infrastructure capacity. We would note that whilst the overall percentage apportionment to Stafford is appropriate and supported, major growth areas are already being promoted in parallel with new or improvements to existing infrastructure. Therefore, the issue of infrastructure capacity is not necessarily one that cannot be overcome were more housing to be focused into Stafford (either in proportion terms or actual housing numbers based on a 72% requirement in Stafford Town). Conversely, greater development in Stafford Town can only improve the viability of delivering new infrastructure.
- 4.6. With regards the issue of the need for further public consultation on the options were these to change, given our view (expressed in Section 2 of this Statement) is that greater housing ought to be planned for across the Borough, the Council needs to ensure that there is a sufficient evidence base supporting its approach and that an appropriate level of consultation is undertaken so that a robust case can be presented at Examination.



## 5. Affordable Housing

### Response to Question 9

- 5.1. Paragraph 6.10 confirms the Council's preferred policy approach is to seek to secure 30% of the total number of dwellings on sites for affordable housing, however, that there is scope for this to be varied on a site by site basis subject to viability testing.
- 5.2. We support the principle of this approach and in planning for growth at Stafford East, have factored in a requirement for 30% affordable housing provision.

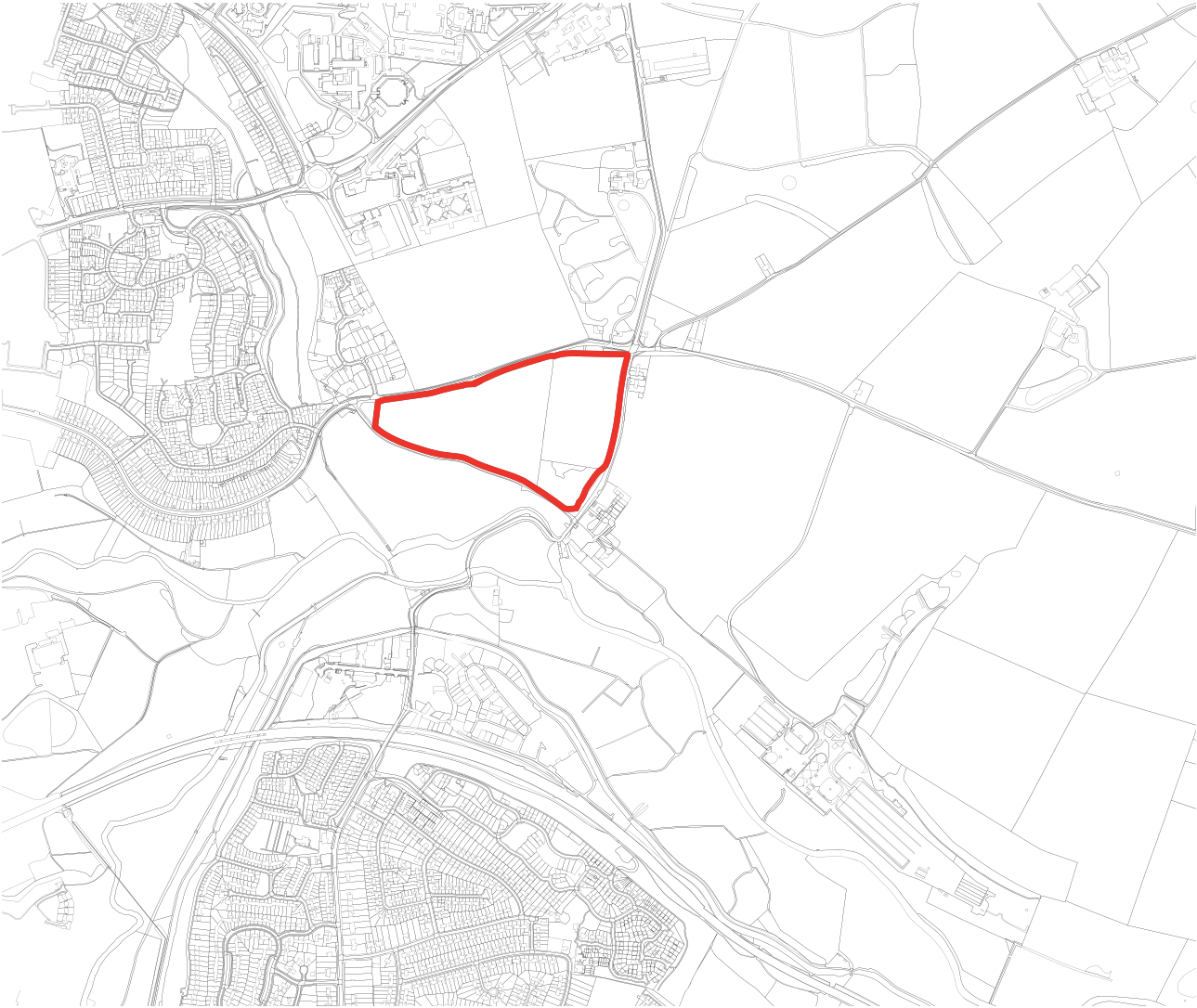
## 6. The Means of Directing Growth

### Response to Question 11

- 6.1. The Council is proposing to identify proposed residential development boundaries in the draft Plan, to assist in identifying when the suggested criteria based policy approach to assessing the suitability of development proposals is applicable.
- 6.2. We support the principle of the Plan identifying new residential development boundaries relating to the spatial distribution of growth proposed through the plan, however, where this relates to the proposed urban extensions to Stafford, given the scale of development that might be accommodated within each, it would be more appropriate to identify these extensions as 'broad areas for development' with the precise boundaries to be defined either through a future Site Allocations DPD and/or future applications for development.
- 6.3. In any event, the extent of any boundary should be sufficient to accommodate the proposed level of development required, particularly in Stafford Town, allowing for a buffer to facilitate and encourage delivery of housing.
- 6.4. With regards Stafford East, this should extend beyond the area shown in the current draft Plan for the reasons set out earlier in this Statement relating to the overall level of housing being planned for in Stafford and its subsequent spatial distribution around the Town.



# Appendix 1



**Site Location Plan**

Kitchen Gill,  
Lambrigg,  
Kendal.  
Cumbria.

Head of Planning & Regeneration,  
Stafford Borough Council,  
Civic Centre,  
Riverside,  
Stafford.  
ST16 3AQ

24th February, 2013

**For the attention of Naomi Perry**

Dear Naomi,

Field No5338 "Audmore Loop" Gnosall.

Firstly, I must thank you for forwarding The Plan for Stafford Borough Publication and your help with the various questions I had via the telephone. I found the document both comprehensive and very helpful.

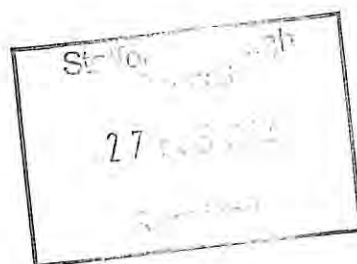
Regarding the completion of the Representation Form, I am having some difficulty with this for I have no queries with your proposals but I am concerned that the above land is included in any development of the Audmore Loop. To this end I have completed part 'A' both for myself and my sister in law Mrs Margaret Minshull who is joint owner, I trust that this is in order.

Whilst I am sure that you will have all the information you require from previous correspondence I have attached a map of the land in question.

To conclude, again many thanks for your help.

Yours sincerely. <sup>^</sup>

J.T.Parkinson



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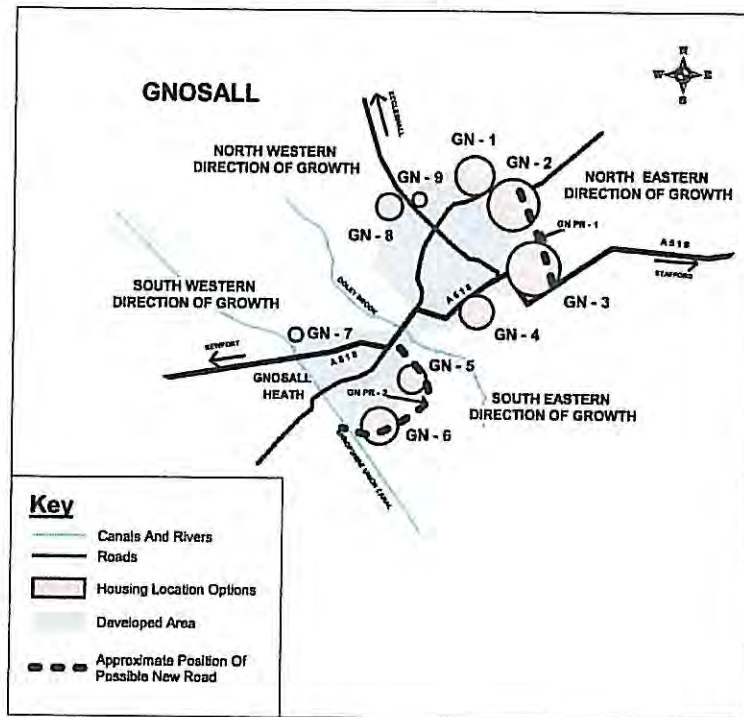
### Gnosall (GN) - Housing Location Options

[View Comments \(130\)](#)

[Add Comments](#)

The diagram below shows a range of options for new homes. No decisions have been made yet on how many new homes are to be provided in this or the other individual villages included in the document. More locations are shown in the settlement diagrams than will be needed. Following consideration of the responses to this consultation, decisions will be made on preferred locations. More detailed maps showing the range of options can be viewed online.

(Popup full image)



#### Spatial Options 4

[View Comments \(1\)](#)

[Add Comments](#)

Possible development locations around Gnosall and Gnosall Heath can be grouped into four separate direction of growth:

- North east
- North west
- South east
- South west

The north eastern direction of growth includes housing locations GN-1 to GN-4. The north western direction of growth includes housing locations GN-8 to GN-9. The south eastern direction of growth includes housing locations GN-5 to GN-6. The south western direction of growth includes housing location GN-7.

Table 8.5

[View Comments \(0\)](#)

[Add Comments](#)

Location Reference	Name of Location	Housing Number
GN-1	Land north of Gnosall	225
GN-2	Land east of Gnosall within the Audmore Loop	270
GN-3	Land east of Gnosall, north of Stafford Road	411
GN-4	Land south of Stafford Road and east of Lowfield Lane	165
GN-5	Land at Gnosall Heath, east of Cowley Lane	120
GN-6	Land at Gnosall Heath, west of Cowley Lane	210
GN-7	Land at Gnosall Heath, south of dis-used railway and east of Plardiwick Road	48
GN-8	Land west of Gnosall, north west of Brookhouse Road	120
GN-9	Land north of Gnosall, north east of Knightley Road	36

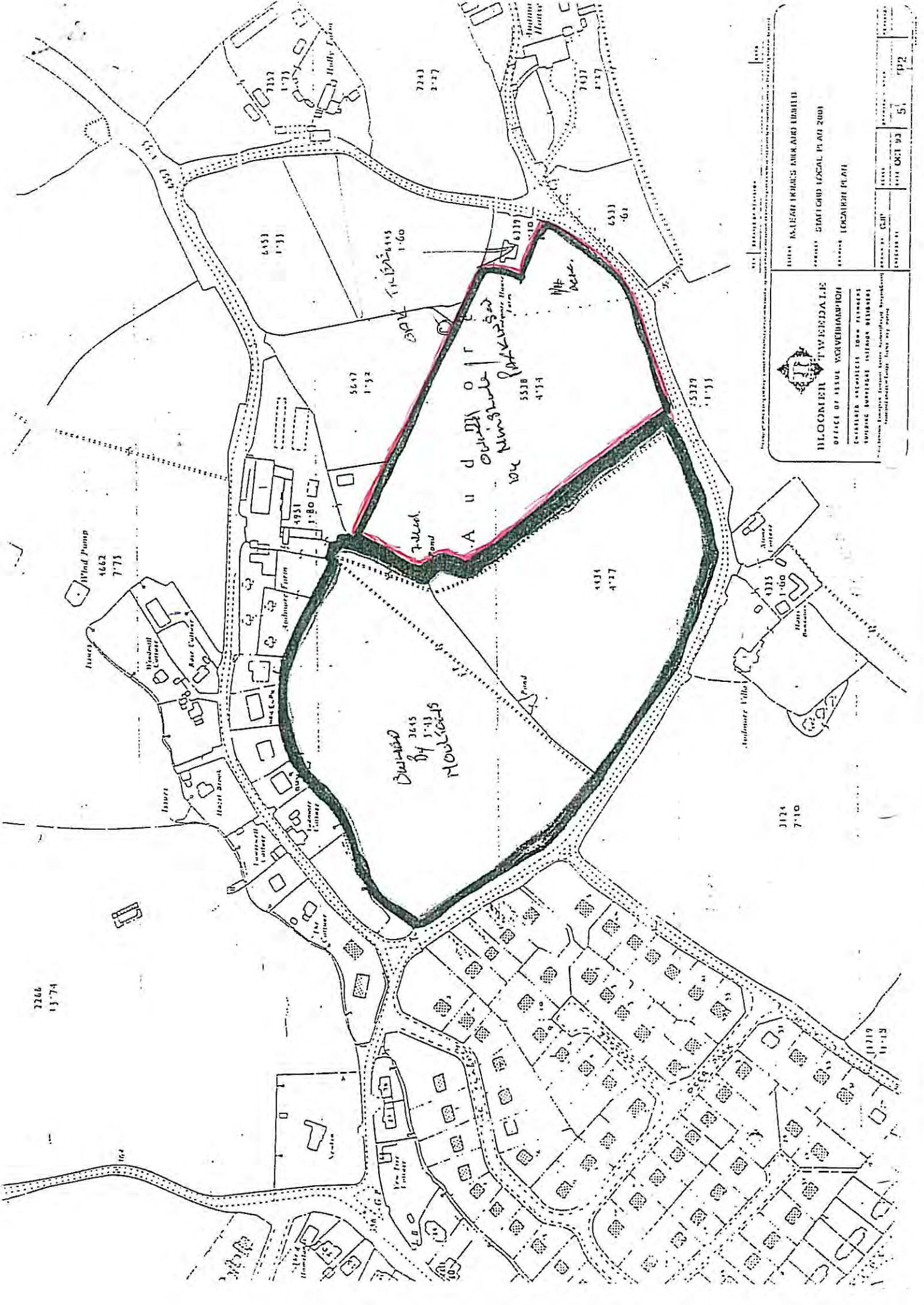
#### What we need to consider

8.28

[View Comments \(3\)](#)

[Add Comments](#)

The settlement has the largest population outside of Stafford and Stone, a significant health facility and good transport links east to Stafford and west to Newport. Gnosall may benefit from improvement of the village centre on land between Brookhouse Road



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 \*\*\*\*\* L-E-C-A-I-R-I-E P-L-A-T \*\*\*\*\*

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To see all the details that are visible on the screen use the Print link next to the map

3338



Our Ref: KDR/AF  
Your Ref:



**Mrs N Perry**  
**Forward Planning Department**  
**Stafford Borough Council**  
**Civic Centre**  
**Riverside**  
**Stafford**  
**Staffordshire ST16 3AQ**

28<sup>th</sup> February 2013

Dear Naomi,

**Re: The Plan for Stafford Borough Publication – Pre Submission Consultation**

Please find enclosed my Consultation Response on behalf of Milwood Ltd for your kind attention.

I would be grateful if you would keep me advised at all times and should you require any further information, please do not hesitate to contact me at any time on 07885 693832 or [kev.ryder@btinternet.com](mailto:kev.ryder@btinternet.com).

Kindest regards

Kev Ryder

**Stafford Borough Council**

**Local Plan 2011 – 2031**

**The Plan for Stafford Borough – Publication**

**(Pre – Submission Consultation)**

**December 2012/January 2013**

**Consultation Response on behalf of Milwood Ltd**

**K.D. Ryder**

**27<sup>th</sup> February 2013**

## **Introduction**

In its current form, we consider that whilst the Local Plan Strategy may be Legally Compliant, the Plan for Stafford Borough is Unsound.

We consider it is both flawed and contradictory in a number of areas and as such, would fail the Test of Soundness when examined by an Inspector.

Our reasons for this position are explained in more detail below.

We do wish to participate at the Examination in Public to further address the points raised.

### **3. Policy Influences (National and Local)**

#### Neighbourhood Planning

Para 3.13 acknowledges the presence of Neighbourhood Planning as a valid part of the Planning System, following its legislation within the Localism Act and subsequent inclusion as part of the NPPF, basically providing a loose summary version of the text contained within the NPPF (paras 183-185).

Para 3.14 goes on to state that SBC will encourage Parish Councils/Community Groups to prepare Neighbourhood Development Plans.

Whilst we appreciate that this is a broadly strategic document, we feel that the level of information contained within this section is lacking sufficient detail.

This is now already an important element and key factor of consideration of the Planning environment, and is set to become more so, as more communities embark upon this process.

This being the case, it has a fundamental role to play in shaping the 'strategic policies' of this emerging plan, to incorporate considerations within the same for Neighbourhood Plans and their content and aspirations of vision.

We understand a number of Parishes/Community Groups have already commenced the process of preparing a Neighbourhood Plan for their respective parishes/communities within the Borough, which only serves to reinforce the above points.

Neighbourhood Planning in this context is simultaneously two fold, it is about the present, and the future.

In the present, they can come forward now, under the existing strategic policies within the existing 2001 Plan, and do not have to wait in abeyance until such time as SBC have an adopted 2011-2031 Plan.

In the future, it is important that Neighbourhood Plans and those who are currently progressing them are given every opportunity to engage with SBC and be actively involved in the creation of the emerging strategic policies of the Local Plan, as such policies will not only be serving the Borough per se, yet will also have to serve the individual Neighbourhood Plan Areas, so such input has got to be a very key consideration by SBC when formulating such strategic policies to ensure compliance with the NPPF and the Localism Act.

We feel that SBC should provide more detailed information on this key area.

We would like to see the consideration and consultation that SBC has undertaken with such groups in respect of formulating their strategic policies, and to see detail of their programme of encouragement. What are they doing to be proactive here, and what support have they/are they providing.

Consultation now at this crucial stage in the emerging plan process, when policies are being formulated, is vital.

If SBC fail to fully consult such groups, and endeavour to ensure that their needs are incorporated into the emerging strategic policies, then they will have failed to comply with the Localism Act and

NPPF and as such, deem this document and strategy approach to be unsound.

Neighbourhood Planning represents one of the biggest single changes to the Planning System of our time, and to simply give it two paragraphs of lip service out of a document of some 177 pages is not sufficient.

The distinct impression is given by SBC that they are intent, in the time honoured fashion, of producing their policies, getting them adopted to suit, and if Neighbourhood Plan proposals fit in with them, then fine, if not, then hard cheese, which is completely contrary to the intent of the Localism Act and relevant content within the NPPF.

## **6. Development Strategy**

### 2. The Borough Wide scale of Housing and Employment

#### Spatial Principle 2 – SP2 – Stafford Borough Housing and Requirements

This states that provision will be made for 500 dwellings per year over the plan period.

This is not stated as either a minimum or maximum, and there is no provision made to exceed 500 should market demand be such.

It further does not take into account the recent Inspector decision at Castleworks which identified a shortfall in SBCs' numbers, and such concluded that they do not have a legitimate 5 year supply.

This is contrary to the requirements of the NPPF, and as such, would be deemed unsound by an Inspector at Public Examination.

This is also inconsistent with Appendix F of this document, which shows projected housing numbers to exceed 500 at points across the plan period.

Whilst this may average out over the lifespan of the plan period, if clear provision is not made to enable an uplift in the 500 dwelling figure, this methodology will fail to serve its purpose.

Para 6.10

This quotes a 6 year supply

This is now inaccurate in light of the recent inspector decision at Castleworks which stated that SBC do not have a 5 year supply, let alone 6, so this should be revised accordingly to reflect the actual situation.

Para 6.52

Again,

This statement needs to reflect the recent inspector decision at Castleworks which stated that SBC do not have a 5 year supply

Para 6.55

Again,

This is now inaccurate in light of the recent inspector decision at Castleworks which stated that SBC do not have a 5 year supply, let alone 6, so this should be revised accordingly to reflect the actual situation.

## **7. Stafford**

Para 7.3



This states that – following an assessment of potential directions of growth for Stafford, through the Stafford Borough Infrastructure Strategy published in July 2009, areas to the north, west and east were identified as being most deliverable, as land to the south has environmental constraints being close to the Cannock Chase Special Area of Conservation as well as having access issues.

As previously stated within previous consultation responses, this is simply untrue.

We are currently promoting a 38acre parcel of land in the south, which has no access issues, and is farther away from Cannock Chase than the closest point of the SDL to the East of Stafford.

Whilst this site may not be large enough to qualify as an SDL, the context of the text written is not in that vein, and simply dismisses the south as a consideration.

This is a matter which we will most assuredly bring before the Inspector during Public Examination.

#### Stafford – Strategic Development Locations

##### 9. – Policy Stafford 2 – North of Stafford

This states that,

Any application for development on a part or the whole of this area must be preceded by, and consistent with, a Masterplan for the whole SDL which has been submitted and agreed by the Council.

This text is followed by a site location plan and a site concept plan only.

As I understand matters, some two Planning Permissions have been granted within this SDL, with work already commenced on one, this being without a comprehensive ‘ approved’ Masterplan being in place.

If such a Masterplan does exist and has been approved, why is it not included within this document in order that respondents can fully assess this proposal in its fullest context before response.

The two enclosed plans in no way constitute a comprehensive Masterplanning exercise, and what of the ‘approval’ by Council.

If I am correct and no such Masterplan exists, nor is approved, then again, this document is

completely floored and inconsistent with itself.

#### 10. – Policy Stafford 3 – West of Stafford

Again, this states that,

Any application for development on a part or the whole of this area must be preceded by, and consistent with, a Masterplan for the whole SDL which has been submitted and agreed by the Council.

This text is followed by a site location plan and a site concept plan only.

As I understand matters, one Planning Permission has been granted within this SDL, this being without a comprehensive 'approved' Masterplan being in place.

If such a Masterplan does exist and has been approved, why is it not included within this document in order that respondents can fully assess this proposal in its fullest context before response.

The two enclosed plans in no way constitute a comprehensive Masterplanning exercise, and what of the 'approval' by Council.

If I am correct and no such Masterplan exists, nor is approved, then again, this document is completely floored and inconsistent with itself.

#### 11. Communities

##### 25 – Policy C2 – Affordable Housing

This states that,

In Stafford Town and all other areas of the Borough a target proportion of 30% affordable housing must be provided on sites greater than the thresholds defined below.

b) in all other settlements, including the rural area outside settlements, all sites of greater than 0.1 Hectares or capable of accommodating 3 dwellings or more.

In deciding whether a particular site qualifies as being above the requisite site size thresholds set out above, the Council will assess not merely the proposal submitted but the potential capacity of the site.

Whilst we appreciate the need for SBC to have a Policy in this regard, we feel that this is very much a 'board brush' approach which does not take into account the specific nature and circumstances of the Borough, particularly within the rural area.

This point is now more so pertinent with the emerging Neighbourhood Planning perspective.

Very often in the rural area, you will find larger, often unique dwellings, situated on much larger plots.

This Policy does not take into account that in such situations, a proposal for a new dwelling, may well be within a plot that could technically withstand a number of dwellings, yet then would be completely out of form and character with its surrounds, for instance other houses within that Village or Hamlet.

We feel that wording should be included within this Policy to account for the same, where the existing form and character of the surrounds will also be a key consideration (A.3 – Policy C5), otherwise, this will fail to be holistic in its approach, not be specific to the conditions and needs of the Borough, and therefore be at conflict with both itself as a document, and wider Legislation and Policy/Guidance.

## 28 – Policy C5 – Residential proposals outside the Settlement Hierarchy

A – New Development

And,

Supporting Para 11.17

Para 11.17 states,

That SBC strategy intends that the primary locations for market/affordable housing will be the settlements in the Hierarchy (SP3), being Stafford, Stone and Key Service Villages, all with RDBs.

Of course, regarding the Green Belt, NPPF policies will apply.

It further promotes the re-use of suitable buildings within the countryside and rural exception sites for affordable housing.

It then goes on to state that isolated dwellings in the countryside will be avoided unless it is required for an identified need.

It also states that,

In rural areas national planning policy states that local planning authorities should be responsive to local circumstances and plan to reflect local needs.

Policy C5 – Part A states that,

In areas outside of settlement boundaries, as defined in Spatial Principle SP7, proposals for new residential development will need to meet the criteria listed in SP7 (i to iv), together with all the following criteria,

1. It is demonstrated that provision can not be accommodated within the settlement hierarchy (SP3)
2. The housing is justified by a Parish based Local Housing Needs Assessment, and an appraisal of the scheme, proving that it will meet the defined needs, shall accompany any planning application
3. The development is of a high quality design that reflects the setting, form and character of the locality and surrounding landscape.

Para 11.17 does seem to cover all the possibilities excepting New Dwellings in and around those Villages and Hamlets that do not have RDBs, of which there are a few within the Borough.

Policy C5 states the criteria in SP7, listing items i to iv, which in turn refers to SP6, which itself lists items i to v, and going on to state in Para 6.60 that,

A key objective of the Plan is to enable an appropriate proportion of new development across the rural areas of the Borough.

(this it has already committed to do within SP4, quoting that the annual target for distribution of housing development in the 'rest of the rural area' will be 8% of the total Borough requirement for the Plan period.)

The achievement of rural sustainability is therefore a key element to be delivered through the Local Plan and necessary to meet the national policy approach set out in the NPPF. This means balancing the qualities of the rural environment with the need to promote sustainable rural communities where people can have good local access to services, facilities and work.

SBC have accounted for new dwellings in the rural areas within its distribution numbers (SP4), has recognised the key importance of rural sustainability, including housing (SP6/Para 6.60), states that local authorities should be responsive to local circumstances and reflect local needs (Para 11.17), lists a criteria for such development (SP7 I to iv), and then, in Policy C5, it attaches additional criterion (items 1 to 3), which, in effect, make it impossible for new market housing to be constructed in and around such Villages and Hamlets within the Borough that do not have an RDB.

The other factor in this equation is Neighbourhood Planning.

As a rural authority, SBC has a number of Villages and Hamlets without RDBs that have already/may in the future commenced the Neighbourhood Plan process.

One such Parish, being Sandon and Burston, does include an element of new market housing within its overall strategy, being a fundamental factor in the sustainability of this locality.

SBC need to revise their situation to include such proposals, as , in this current form, this document is fundamentally flawed and is not consistent with the NPPF, and is also contrary to the intent of the Localism Act and Neighbourhood Planning.

The text within this document is again, only a watered down version of that within the NPPF, and, as such, does not contain all of its statements, which then fails to allow the reader/assessor to read and understand the full context of the proposed policy/ies.

Furthermore,

Having read through the NPPF, and in particular Chapter 6, I can find no consistency with the restrictions placed on such development as those proposed by SBC, and moreover, no where in this document do the Government state that such development is unacceptable.

## **12. Environment**

We feel that the text within this proposed Policy is too summarised and not as definitive as it should be.

Such grey areas will only lead to unnecessary challenge and confusion.

SBC should revise this to make it much clearer and much more robust in its position and intent.

SBC, along with other neighbouring authorities have invested a lot of time and money into the Staffordshire County Wide Renewable / Low Carbon Energy Study.

In terms of Stafford Borough, as shown upon the Study Plan in Para 12.22, it has clearly defined those areas within the Borough that offer any degree of potential for such schemes.

This being the case, we feel that SBC should again revise Policy N3 to state that,

'Only scheme proposals put forward within the designated areas upon the said plan, will be considered positively.'

This would remove all the abundant negative speculation that has been present in the area for some considerable time, and avoid unnecessary stress, anxiety and loss of money on behalf of residents having to fight sporadic proposals, and also avoid unnecessary wasted time by SBC officers, dealing with such applications and discussions that do not materialise.

Such a revision would make the position clear to everyone concerned, and would still maintain the global commitment made to reduce co2 omissions etc.

The Study was undertaken for a reason, to assess the actual potential, and to guide any such application for such schemes.

If SBC now fail to make use of this information and guidance, and give certainty to the situation, what was the point in doing it in the first place.

## The Plan for Stafford Borough - Publication (pre-submission)

<b>Event Name</b>	The Plan for Stafford Borough - Publication (pre-submission)
<b>Comment by</b>	Mr Peter Bowen
<b>Comment ID</b>	PS572
<b>Response Date</b>	28/02/13 11:24
<b>Consultation Point</b>	11 POLICY STAFFORD 4 ? EAST OF STAFFORD ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<b>Version</b>	0.3

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

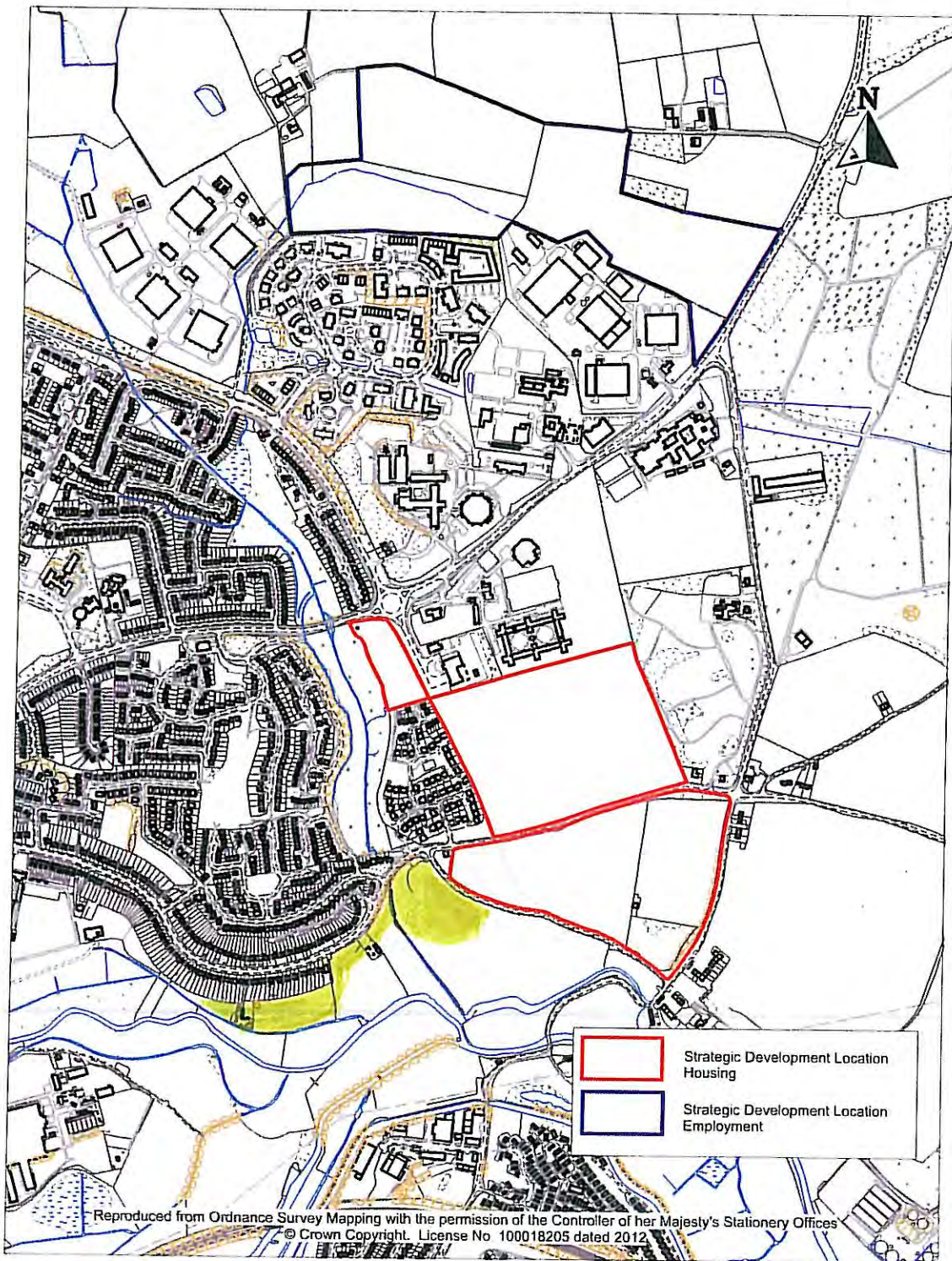
**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

I am writing on behalf of myself and Mr R Madders, to request that your department reconsider the suitability of the 3 sites in Tixall Road Stafford, highlighted in green on the enclosed map, for inclusion in the Local Framework Plan. The sites highlighted are all above the floodplain.

These sites have been put forward previously by C T Planning Market Street, Lichfield and we would appreciate if it you could reconsider the submissions by them on our behalf.

The sites would meet up with other sites already proposed for inclusion within the Draft Plan and are close to schools, hospital and other local amenities, including a regular bus route, making them suitable for affordable housing for first-time buyers / housing associations. IN view of the possible loss of some 500+ homes from the plan, due to the proposed HS2 rail link, we hope you will look favourably on this request.

### Development to the East of Stafford





RECEIVED BY HAND  
12:55 @ 27/2/2013.

Head of planning & regeneration services,  
Stafford Borough Council,  
Civic Centre,  
Riverside,  
Stafford, ST16 3AQ

Mr. M. Barlow,  
236 Doxey.  
Stafford,  
ST16 1EE

26/02/2013

### The Plan For Stafford Borough

I have read through the publication pre-submission document, and would like to make the following comments.

1. To many houses allocated to STAFFORD this being 5500 up to the year 2031, this should be reduced by 1000 and allocated to rural areas.

Stafford is already suffering from the same problem as many other towns all over the country, which is shoppers are going to out of town retail parks which are easily accessible by road, rail and public transport and where parking is free.

There are presently 12 shops closed in the main street , a further 8 empty in the guildhall, with the Co-op , Millets, Druckers and HMV due to close in the next few weeks.

Stafford market has also suffered since Stafford Borough Council moved it in 1989, there are now only half as many stalls and very few customers compared to the old market. Once the full impact of internet shopping takes full effect, I believe more shops will close in the town centre, or relocate to the various retail parks.

2. The proposals for STONE seem to be about right, building 800 new houses up to the year 2031 also increasing the size of existing business premises as well as providing new sites for business premises to be located. Stone is fairly compact and draws business and shopping trade from local villages as well as further afield. There is a good road system with the A34 connecting Stone to Stafford and also the potteries. There is a good mixture of shops as well as a supermarket and easy access to the new marina at Aston.
3. RURAL AREAS If the allocation for housing in Stafford were to be reduced by 1000 up to the year 2031 and allocated to rural areas, this would make the total allocation to rural areas 3000 up to the year 2031. Some of the key service villages listed in this publication also have industrial sites either in the village or quite near to the village, and could be expanded to provide more local jobs in rural areas. It only seems reasonable to allocate more housing to key service villages with industrial sites – one example is Hixon, with two industrial sites and another example is Eccleshall, with Raleigh Hall industrial site nearby.

At present most workers have to travel to get to their place of work because there are no houses available or they are too expensive.

If the 3000 new dwellings were built up to the year 2031 and divided amongst the villages that most needed them, some villages would not be suitable for many new dwellings because of the infrastructure.

It would also be reasonable to set a figure on the number of affordable houses on any new development, this could be as high as 40 per cent which should provide 1200 affordable houses up to the year 2031 spread over the area.

Some of the villages that would expand most with new housing and attracting new business would also have to expand their retail facilities.



Michael Barlow.

RECEIVED

27 FEB 2013

# Part A

## I. Personal Details\*

## 2. Agent's Details (if applicable)

\*If an agent is appointed please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

Title	MR	
First Name	CHARLES, GRAHAM	
Last Name	MADDOX	
Job Title (if applicable)	RETIRED	
Organisation (if applicable)	/	
Address Line 1	ANKERTON ASH,	
Address Line 2	ECCLESHALL,	
Address Line 3	STAFFORD.	
Address Line 4		
Postcode	ST21 6LZ.	
Telephone Number	01785-851453	
E-mail address	/	

## Part B – Please use a separate sheet for each representation

Name or Organisation

MR CHARLES GRAHAM MADDOX

3. What part of The Plan for Stafford Borough (including the Policies Maps document) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title

ALL REFERENCES TO RALEIGH HALL INDUSTRIAL SITE  
2.26 5.2(24) 6.28 E1 E2 9.12 9.13  
9.15 E4 9.16 9.17.

If your comment does not relate to a specific part of the document, or it relates to a different document, for example the Sustainability Appraisal, please make this clear in your response.

4. Do you consider that the Plan for Stafford Borough is:

- a. Legally compliant\*?  
Yes  No
- b. Sound\*?  
Yes  No

To check a box when completing this form electronically, double click on it and select 'checked' under default value.  
\*Please refer to the attached note for guidance on legal requirements and soundness.

If you have entered **No** to Q4.b. please continue to Q5. In all other circumstances please go to Q6.

5. Do you consider The Plan for Stafford Borough is unsound because it is not:

- a. Positively Prepared
- b. Justified
- c. Effective
- d. Consistent with national policy

6. Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.

The proposed extension to the Raleigh Hall Industrial site is unsound on the following grounds:-

- Extension on to high quality agricultural land.
- Flooding problems.
- Impact on the local historic town of Ecdeshall
- Inadequate infrastructure

CONTINUED ON ATTACHED SHEET  
(attach separate sheets as necessary)

7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough legally compliant or sound, having regard to the test you have identified at question 5. You will need to say why this change will make the document legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The detriment/gain ratio would be totally disproportionate on grounds of both the cost and the destruction of the amenity/character of the area and its impact on local residents.

To alleviate the problems in Eccleshall (SEE COMMENTS UNDER SECTION 6.) would involve a by-pass to the South, West  
(attach separate sheets as necessary)

CONTINUED ON ATTACHED SHEET.

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

In order to prevent an escalation of an already serious problem in the town of Eccleshall and to protect the general public from the serious and unjustifiable detrimental effects that such a development would have on their quality of life.

(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

## Section 6 continuation (Page 1)

### e) Impact on local residents.

The proposed development is outside a "Recognised Industrial Estate" and is not "Complementary to Viable Agricultural Operations". Industrial buildings will not be "In keeping with their Surroundings" will be "Detrimental to the Amenity" of the area and will "Undermine the Character of the Open Countryside".

The land is superb agricultural land, described by local farmers as "strong" land. Brownfield sites should be the preferred option.

The lower part of the site is subject to extensive flooding which also impacts onto the Council owned roads of Arkerton Lane and the link road from Cats Hill Cross to Sturbridge. (PHOTOGRAPHS AVAILABLE ON REQUEST) Any further hard-surfacing can only exacerbate the problem.

The old historic town of Eccleshall already has a serious problem with heavy goods vehicles passing through its narrow streets. Traffic from Stafford and the M6 (south), from Newport Road and from the Market Drayton/Whitchurch direction have no alternative but to pass through the town after causing gridlock in the streets and sometimes damage to parked vehicles. Even access from the M6 (north) and the Stoke-on-Trent area is poor with narrow bridges and sharp bends to negotiate. Access to Raleigh Hall from this direction involves going to the outskirts of Eccleshall and negotiating a sharp turn at the Byanna junction.

To alleviate these problems would involve major changes to the infrastructure, the expense of which would be totally disproportionate to any gain in industrial employment and with the limited size of the new proposed area and the low level of employment that small units can generate would be non-viable and unacceptable.

Previous assurances and mis-leading claims should be a consideration. When the bio-mass plant was designated to this field in 2003 the then planning officers justified its siting on agricultural land claiming local farmers would benefit by growing crops to fuel it. This has since proved not to be the case and the original environmentally sound concept has ceased to apply. At that time we were assured that it would not increase in size, indeed could not, however subsequently it has increased three-fold. We were also

## Section 6 continuation (Page 2)

assured that there would be no further development into the remainder of the field.

One would expect some integrity on this issue.

## Section 7 continuation.

and possibly East of the town, whilst to provide an alternative access to the site from that on the Sweeney Road would involve a roundabout or traffic lights on the main A519 road at Cats Hill Cross which would severely impact on the residences in that area with its proximity and increased noise from vehicles stopping, starting and manoeuvring and the resultant serious detriment to the residents quality of life.

The proposal for the extension of the Raleigh Hall Industrial site should be withdrawn.

Stafford Borough Council  
Civic Centre  
Riverside  
Staffordshire  
ST16 3AQ

The Cube  
9<sup>th</sup> Floor  
199 Wharfside Street  
Birmingham  
B1 1RN

For the attention of: Alex Yendole

<http://www.highways.gov.uk>

26th February 2013

Dear Alex

### **STAFFORD LOCAL PLAN - CONSULTATION DRAFT**

Thank you for the information recently submitted, the Highways Agency welcomes the opportunity to comment on the Publication Draft Local Plan and would like to make the following comments:

The plan broadly supports the overall spatial strategy, which focuses future development on the most sustainable and accessible locations.

The modelling work undertaken confirms that the greatest impacts arising on the SRN will be on junctions 13 and 14 of the M6. It is critical that robust assessments are undertaken as part of the proposed master-planning process for each of the strategic locations, and major employment sites, to ensure that these impacts are acceptable and that, where necessary, appropriate strategies for mitigation are identified. The inherent references to ensuring that any necessary infrastructure is in place at the right time and to fostering more sustainable transport patterns are also welcome.

The wording of Policy T1 is broadly supported, particularly the references to the GTA and to national policy in respect of the SRN. However, these references would perhaps fit better under part (b). The reference to Transport Assessments and Travel Plans in (b) is also welcome, although the reference to 'considering' public transport could be strengthened through alternative wording such as 'maximising use' of public transport. And in (c) where there is reference to developers working with the Agency to improve road safety - an additional part of joint-working is to reduce road congestion and to improve efficiency on the road network.

Paragraph 10.6 comments on schemes which may generate large levels of traffic, including heavy goods traffic – and notes that these should have good access links to the main transportation networks. We previously recommended that this wording should be amended to confirm that other factors such as sustainability considerations should also be taken into account, and that development will only be acceptable where the impact on the network can be sufficiently accommodated, as identified within evidence based testing. These comments have not been addressed and remain valid.



We note that there is an absence of any reference either within the Local Plan itself or within the online LDF evidence documents to the JMP/HA modelling work of the M6. This work forms a critical part of the transport evidence base and should be clearly referenced.

I trust that you will find our comments useful and should you have any queries please do not hesitate to contact me

Yours faithfully



Samantha Pinnock  
Asset Manager  
Network Delivery and Development West Midlands

## The Plan for Stafford Borough - Publication (pre-submission)

Event Name	The Plan for Stafford Borough - Publication (pre-submission)
Comment by	Mrs MBL Booth
Comment ID	PS576
Response Date	25/02/13 21:28
Consultation Point	6 Development Strategy ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

**Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.**

Having read the above document on your website, I have the following comments to make on it, for the Council's consideration. I have no objection to this response being made public. I am writing a letter, as the system for making comments on the website is complicated, and I do not have the time to separate out and input each comment to the relevant paragraph online. **6.29** ? for 6.29 Gnosall has the largest population outside of Stafford and Stone': We noted with some surprise that the population of Gnosall is now far greater than that of Eccleshall. A few years ago their numbers were very similar. Eccleshall is considered by many as a small town, rather than a village, with its range of shops, services and facilities. However, Gnosall, with a larger population, lags some way behind as regards all of these. Before more housing, which would result in yet more population growth, is allowed more services and infrastructure should be provided in the Gnosall area. **6.42** To quote from the draft ?..... the previous Stafford Borough Local Plan 2001 sought to concentrate development in the main settlements, and provided a number of housing allocations at Stafford, Stone and at the Key Service Villages across the Stafford Borough area with the following distribution: ? Stafford - 78% ? Stone - 17% ? Key Service Villages - 5%'. **6.43** ? However, having monitored the number of housing completions and commitments over a number of years, it is evident that the following distribution of development has generally occurred during the period from 2001 to the present: ? Stafford - 48% ? Stone - 17% ? **Rural Area - 35%**'. These figures demonstrate that actual housing development in the rural areas since 2001 is so out of kilter with what was set out in the Local Plan 2001 that the proposed moratorium in paragraph 6.49 should be strictly enforced. 35% in the rural areas as opposed to 5% is a major discrepancy, and appears to show a level of incompetence. There is a change of terminology - in 6.42 ?Key Service Villages' and in 6.43 ?Rural Area' - which should be explained fully. **6.63** for 6.63 ?A key element of the approach is that new Settlement Boundaries will be established in the Plan for Stafford Borough for each of the settlements in the Sustainable Settlement Hierarchy.' **6.64** ? For the Key Service Villages, the location of the boundaries will be established for these settlements through the Neighbourhood Planning process, or through a Site-specific Allocations and Policies document if

Neighbourhood Plans are not forthcoming. Prior to the actual definition being achieved through these processes, the criteria established in the Spatial Principle will be used to judge the acceptability of individual development proposals.' It is of concern to us that the residential development boundaries of Key Service Villages will no longer be in place. This is likely to result in a free-for-all as regards developers and those with land they wish to sell for housing, notwithstanding proposed Spatial Principle 7. If communities, usually led by their Parish Councils, need to produce Neighbourhood Plans defining their boundaries, they must be given every assistance by the Local Planning Authority in this important task. It is a lot to expect from mainly volunteers. A system needs to be put in place to protect villages in the interim period before the Neighbourhood Plan is prepared and adopted. **12.22 The map showing potential sites for wind turbines may cause housing blight in these areas. The sites shown north and south of Gnosall are unlikely to be areas of high wind density, and unlikely to be far enough away from housing. Appendix C Nature Designations List is welcomed, with its extensive details of sites of environmental importance.**

## Comments

### The Plan for Stafford Borough - Publication (pre-submission) (14/01/13 to 28/02/13)

<b>Comment by</b>	P. A Taylor Plans Design and construct ltd (Mr Phil Taylor)
<b>Comment ID</b>	PS577
<b>Response Date</b>	12/04/13 11:08
<b>Consultation Point</b>	The Plan for Stafford Borough - Publication ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<b>Version</b>	0.3
<b>Files</b>	<a href="#">PS 577 P A Taylor.pdf</a>

If you have entered no to either of the previous questions please answer question below.

**Do you consider The Plan for Stafford Borough is unsound because it is not:**

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11 March 2013

Strategic Planning team  
Stafford Borough Council  
Civic Centre  
Riverside  
Stafford  
ST163 AQ

Dear Sir,

**Re:**  
**Proposal for change of use classification, site adjacent to Hyde Lea Care home Burton Manor Stafford**

It is our understanding that sites are being requested to be brought forward for re classification, of use for forward planning, and alterations and changes in policy and site allocation.

Our client as recently purchased the site contained in the enclosed details, Ref: 28.02.13 Plan 1 site denoted A, and wishes that the use of this site can be re considered for re evaluation under the proposals put forward.

Our client currently, owns the adjoining site which provides dementia and elderly care for 82 residents. The current aging demographic is increasing at a very fast rate and currently in Stafford there are limited areas which to provide rest bite and sheltered housing for a population growth increase in the elderly sector.

This 10 acre site between two large expanses of residential settlement would we feel be a perfect addition to satisfy this need and would provided a unique facility within Stafford. Our client was hoping this site would be considered for this.

Planning was going to be brought forward for this scheme if policy would support such an application.

His intention would be to bring 50, two bedroom sheltered bungalow low rise schemes, with warden care and central community facilities and rest bite care unit to this site. This would create a community facility within the areas and infill the two main housing settlements without un due influence upon the surrounding area and be in keeping with national frame work policy and forward thinking for the increase in the aging demographic to the area.

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We apologise for the lack of research for this to back this statement but we have had very limited time to prepare this for the consideration of the strategic team as the cut off date is today for sites to be considered which we only found out a few days previously.

We hope a favourable outcome can be brought for this area, and the use of the site can be considered, as our client wish to invest substantial sums in order to create the vision which he feels will benefit the surrounding area and population as a whole within the area of Stafford and keep residents in Stafford and provide rest bite and sheltered housing for the area, which currently is very limited and as no ability to grow or increase.

Phil Taylor  
for and on behalf of  
**P. A. Taylor Plans Design and Construct Limited**

Enc  
Details of ownership and land information  
Proposed Plan 28.02.12 Plan 1 Land area A

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### KEY

#### General

- ◊ Specified Site
- × Bearing Reference Point
- ◻ Buffer

#### Agency & Hydrological Environment Agency Indicative Floodplain

- ▨ Indicative Fluvial Floodplain
- ▩ Indicative Tidal Floodplain

A Landmark Information Group Service

Report Reference: 8614201-1-1

Date: 20-Jan-2005

ecinset v2.1

Page 1



LAND AT BURTON MANOR, STAFFORD

PLAN 1.



SCALE: 1:2500 @ A3  
REF: SER/ISA/150

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