

**STAFFORD BOROUGH COUNCIL
THE PLAN FOR STAFFORD BOROUGH - EXAMINATION
INITIAL QUESTIONS TO THE COUNCIL & RESPONSE**

1. Submission of The Plan for Stafford Borough

The Plan for Stafford Borough (the "Plan") was submitted to the Secretary of State on 20 August 2013, along with the submission documents and the evidence base. The Inspector now has all the submitted documents in paper and electronic form. He notes that the Council has prepared an Examination Library, with a referenced list of the Submission Documents, Evidence Documents and other documents likely to be referred to. Paper copies of all documents in the Examination Library will be needed for inspection before and during the hearing sessions (including copies for the Programme Officer and Council). ***Can the Council confirm that all the documents and information included in the Local Development Regulations¹ have been submitted to the Secretary of State? Are there any outstanding documents, reports or studies to be submitted, and if so, what is the likely timetable for completion?***

Response:

The Council can confirm that all the documents and information included in the Local Development Regulations have been submitted to the Secretary of State. At this stage there is one outstanding report being prepared on behalf of Staffordshire County Council by ATKINS consultants to provide further background evidence to support the Integrated Transport Strategy (Examination Library Document D18). It is anticipated that this report will be made available by Friday 20 September 2013 and will be added to the Examination Library and provided as a hard copy when received.

2. Hearing sessions

The Council would prefer the hearing sessions of the examination to commence on Wednesday 23 October 2013, and anticipates that some 5-7 hearing days may be required. The Inspector suggests that 7 days of hearing sessions should initially be arranged, commencing on Wednesday 23 October 2013 and finishing on Friday 1 November 2013. At least 6 weeks notice of the start of the hearing sessions is needed, including press advertisement². The Inspector understands that the hearing sessions will be held at the Civic Suite at the Council's offices at Riverside, Stafford. A medium-sized meeting room with "U"-shaped table and rows of seats for observers would be suitable. The Programme Officer and Inspector will need separate rooms, with a car parking space for the Inspector. ***Can the Council confirm that they will make the necessary arrangements for the hearing sessions, including accommodation for the Inspector and Programme Officer and press advertisements?***

Response:

The Council can confirm that the necessary arrangements have commenced for the hearing sessions beginning on Wednesday 23 October 2013 until Friday 1 November 2013, including providing accommodation for the Inspector and the Programme Officer, which will be in place in good time. The Council will ensure that Regulations 24 and 35 of the Town and Country Planning (Local Planning) (England) Regulation 2012 are met regarding notification

¹ Town & Country Planning (Local Planning) (England) Regulations 2012 [SI. 2012/767] (Reg.22)

² Town & Country Planning (Local Planning) (England) Regulations 2012 [SI. 2012/767] (Reg. 24)

of the Examination at least 6 weeks before the start of the hearing sessions.

3. Pre-Hearing Meeting

Pre-Hearing Meetings (PHM) are not always held nowadays for Local Plan examinations. However, where complex or contentious issues are raised and/or large numbers of unrepresented people have raised objections, a PHM can be useful, in order to explain the examination process and the procedural and administrative arrangements. Where the issues are relatively straightforward, such a meeting may not be necessary. If the Council wishes the Inspector to hold a PHM before the hearing sessions open, at least four weeks notice is required. The likely date for a PHM would be w/c 30 September 2013. However, this would delay the opening of the hearing sessions until early December 2013, given the Inspector's availability and the need for sufficient time to prepare hearing statements ***Can the Council indicate whether they wish the Inspector to hold a Pre-Hearing Meeting and indicate their preference of date for the PHM, including the venue?***

Response:

The Council would suggest that a Pre Hearing Meeting is not held prior to the hearing sessions on the Plan for Stafford Borough.

4. Representations

The Council has confirmed that some 575 representations were made on the Publication version of the Plan by 145 individuals/organisation between 16 January–28 February 2013, along with 11 late representations; these have been forwarded to the Inspector. At present, the Inspector has no information about which representors wish to be involved in the hearing sessions. It would be helpful to have a summary list of representations in policy order, with an indication of who wishes to participate at the hearing sessions, as soon as possible. The Inspector also notes that links to the representations are available on the Council's web-site. ***Can the Council confirm firstly, whether they have formally accepted or rejected any of the late representations, and secondly, that a summary list of representations in policy order, indicating who wishes to appear at the hearings, will be prepared as soon as possible?*** The Inspector notes that the Technical Note accompanying the late representation from Taylor Wimpey UK Ltd (Barton Willmore) is not included in the documentation. ***Could this be forwarded to the Inspector.***

Response:

The Council can confirm that it formally accepts the late representations received for consideration as part of the Examination process and will notify the relevant representors in accordance with Regulation 24 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Please find attached Appendix 1 which provides a summary list of the representations in policy order, indicating who wishes to appear at the hearings.

Following a number of requests to Barton Willmore for the Technical Note accompanying the late representation, to date the requested documentation has not been provided. Appendix 2 sets out the exchange of e-mail messages. Should the information become available the Council will forward the material to the Inspector.

5. Council's responses to representations

The Inspector notes that the Council has summarised the main issues raised in the representations (Document A14), including the development strategy, the strategy for Stafford and Stone, economy, transport, communities, environment and infrastructure, delivery and viability. The examination hearings are likely to focus on these issues. However, apart from making some minor changes to the Plan, the Council has not responded to the main issues identified. ***Does the Council intend to respond to the main issues raised in the representations, or will this be done in the Council's statements to the hearings?***

Response:

The Council believes that the main issues raised in these representations were fully considered in the preparation of the Plan, and that the Plan as submitted is sound. It therefore intends to respond to the main issues raised in the representations through the Council's statements at the hearing sessions.

6. Meetings with representors

The Inspector would like to know whether the Council's officers are having any meetings with various bodies and key representors with a view to resolving the issues in dispute before the hearings commence. Statements of Common Ground can be useful in narrowing the issues in dispute, and should be submitted well before the hearings commence. ***Can the Council indicate whether any meetings are being held / to be held with relevant parties before the hearings commence?***

Response:

The Council can confirm that a meeting will be sought with English Heritage in early to mid September 2013 with a view to establishing the position regarding the issues in dispute concerning development of land west of Stafford, as set out in the letter sent to the Council by English Heritage and included in the Duty to Co-operate Statement – Appendix (Examination Library Document B3 – pages 63 - 64). A Statement of Common Ground with English Heritage will also be sought.

Discussion will continue, where appropriate and feasible with other representors to the Plan for Stafford Borough – Publication (Examination Library Document A1), and further updates may be provided before the hearings.

7. Proposed changes to the Published Plan

The Inspector notes that the Council proposes to make some amendments to the Publication version of the Plan (Document A26). The Inspector will consider whether these amendments fall within the category of "Additional Modifications", rather than "Main Modifications" relating to the soundness of the plan. ***Has the Council confirmed with relevant statutory consultees (eg. Natural England, English Heritage, Environment Agency, district/county councils and other representors) that the proposed changes address their concerns? Does the Council envisage making any further changes to the submitted Plan, and would such changes require public consultation and further sustainability appraisal?***

Response:

The Council can confirm that a number of relevant consultees have been engaged in preparing the Additional (Minor) Modifications document (Examination Library Document A26) with the proposed

changes addressing their concerns. Relevant electronic documentation is attached demonstrating engagement with relevant consultees at Appendix 3. Furthermore a Statement of Common Ground with Natural England has been produced, attached as Appendix 4.

The Council will continue to have discussions with representors to the Plan for Stafford Borough – Publication (Examination Library Document A1) and further updates may be available before the hearing sessions

At this stage the Council does not envisage making any further changes to the submitted Plan (Examination Library Document A1). However should further modifications (as Main Modifications) be required to the Plan, arising through the hearing sessions, the Council will carry out public consultation and Sustainability Appraisal as required.

8. Main Modifications

The Council has requested the Inspector to recommend any modifications required to make the plan sound, under Section 20(7C) of the 2004 Act. He will confirm whether he considers any *Main Modifications* are necessary to make the plan sound and capable of adoption during the course of the examination.

Response:

Noted. The Council look forward to receiving confirmation from the Planning Inspector with regards to Main Modifications in due course.

9. Hearings

The Inspector will produce Guidance Notes to outline the nature and scope of the hearing sessions. Please note that only those representors who seek some change to the plan can request an oral hearing. The Programme Officer will clarify and confirm the attendance of participants at the hearings. The hearing sessions are an informal round-table discussion, where the Inspector asks questions and participants discuss key matters based on the Matters & Issues identified for Examination. There is no need for legal representation, but lawyers can attend as a member of the team. ***Has the Council decided whether they will be legally represented at the hearings? The Council should also ensure and confirm that the required notification and advertisement of the examination hearings is made at least six weeks before the start of the hearing sessions.***

Response:

The Council can confirm that it will not be legally represented at the hearing sessions. The Council will ensure that Regulations 24 and 35 of the Town and Country Planning (Local Planning) (England) Regulation 2012 are met regarding notification of the Examination at least 6 weeks before the start of the hearing sessions.

10. Legal and procedural requirements

The Inspector notes that the Council has undertaken Self-Assessments of Soundness and Legal Compliance of the Plan (Documents B4/B5). The Inspector also notes that the Council has produced a statement outlining how it has met the requirements of the Duty to Co-operate (Document B3). ***Can the Council indicate whether any representors have challenged***

to legal and procedural requirements related to the Plan, including the Duty to Co-operate, and whether there are any fundamental shortcomings in terms of the legal and procedural requirements, including the Duty to Co-operate?

Response:

A number of representations suggest that the Plan for Stafford Borough is not legally compliant although no specific details have been provided in terms of not meeting legal and procedural requirements. The Council consider that the Plan for Stafford Borough is legally compliant by meeting the legal and procedural requirements, including the Duty to Co-operate, as set out in detail through the Legal Compliance checklist (Examination Library Document B5) and the Duty to Co-operate Statement (Examination Library Document B3).

11. **Sustainability Appraisal**

The Inspector notes the various documents on sustainability appraisal included with the submission documents (Documents A10-A12; H1-H15). ***Can the Council confirm that the Sustainability Appraisal reports fully appraise all the various alternative options and clearly indicate why the preferred option was chosen, including any necessary mitigation measures and the reasons for rejecting other reasonable alternatives, and whether there are any outstanding issues related to the sustainability appraisal work?***

Response:

The Council can confirm that the Sustainability Appraisal reports fully appraise all the various alternative options and indicate why the preferred option was chosen, as set out through the Revised Sustainability Appraisal Report (Examination Library Document A10). There are no outstanding issues relating to the Sustainability Appraisal work. Please also refer to the Soundness Self Assessment Checklist (Examination Library Document B4), relating to alternatives, in the context of the justification soundness test.

12. **Appropriate Assessment under the Habitat Regulations**

The Inspector notes the various documents submitted under the Habitat Regulations, including Habitat Regulations Assessment of the Plan and the Cannock Chase SAC (Documents A24/A25/D30-D33/E50-53). ***Can the Council confirm whether there are any outstanding issues relating to the Appropriate Assessment under the Habitat Regulations and other reports, and whether Natural England and other relevant bodies are satisfied with the approach, including the approach to the Cannock Chase Special Area of Conservation?***

Response:

The Council can confirm that there are no outstanding issues relating to the Appropriate Assessment under the Habitat Regulations and Natural England are satisfied with the approach taken, including the approach to the Cannock Chase Special Area of Conservation, as set out in documentation included in Appendix 5.

13. Strategic Flood Risk Assessment

The Inspector notes the documents relating to flood risk and water management (Documents D40-D50). ***Can the Council confirm whether there are any outstanding issues relating to the Strategic Flood Risk Assessment and water management, and that the approach has been agreed with the Environment Agency?***

Response:

The Council can confirm that there are no outstanding issues relating to the Strategic Flood Risk Assessment and water management and the Environment Agency have agreed with the approach taken, as set out in documentation included in Appendix 6.

14. Transportation

The Inspector notes the documents relating to transportation (Documents D18-D27/E28-E49). ***Can the Council confirm whether there are any outstanding issues related to transport infrastructure, and whether the Highways Agency and Highways Authority have any concerns about the plan's strategy?***

Response:

The Council can confirm that there are no outstanding issues relating to transport infrastructure. Neither the Highways Agency nor Staffordshire County Council as the Highways Authority have any concerns about the Plan's strategy, as set out in documentation included in Appendix 7.

15. List of "saved" Local Plan policies superseded by the submitted Plan

The Inspector notes that the submitted Plan does not include a list of those "saved" policies of the Stafford Borough Local Plan 2001 that are being superseded by those in the submitted Plan. The Local Planning Regulations³ state that, where a local plan contains a policy that is intended to supersede another policy in the adopted development plan, it must state that fact and identify the superseded policy. ***Can the Council confirm whether it is intended to produce such a schedule for inclusion in the submitted Plan?***

Response:

As set out in paragraph 1.1 of the Plan for Stafford Borough – Publication (Examination Library Document A1) all of the policies in the adopted Stafford Borough Local Plan 2001 will be superseded and fully replaced by the new Local Plan. Therefore the Plan for Stafford Borough – Publication (Examination Library Document A1) will provide the full suite of new policies to deliver new development through strategic policies, site allocations and more detailed policies for deciding planning applications. If the Planning Inspector wishes to have a full list of Stafford Borough Local Plan 2001 policies which will be replaced by the new Local Plan this can be provided for inclusion in the submitted Plan.

³ Town & Country Planning (Local Planning) (England) Regulations 2012 [SI. 2012/767] (Reg. 8(5))

16. Topic/Background Papers

In some cases, the Council produces Background/Topic Papers to accompany the consultation or submission of the Local Plan. Ideally, these should have been prepared before the plan was formally submitted, to provide further support/explanation for the submitted Plan. ***Can the Council confirm whether it intends to prepare any Background/Topic Papers for the examination and indicate a timescale for publication?*** Background/Topic Papers should be produced well before the hearings commence, preferably by mid-September 2013, but should be authorised by the Inspector before preparation. They should summarise and draw on material already in the evidence base, rather than introducing new evidence.

At this early stage, the Inspector considers it would be helpful if the Council could produce a background paper covering the following topics:

- Development strategy, including justification for the proposed development strategy, the spatial principles, overall amount and distribution of development (including Stafford and Stone), and the alternative strategies considered;
- Overall housing provision, including establishing and meeting the objective assessment of housing requirements for the district and the relevant housing market area, how any strategic and cross-boundary issues have been addressed, the outcome of the latest Strategic Housing Market Assessments & Strategic Housing Land Availability Assessments, and the implications of recent population and household projections, including the latest 2011-based Household Interim Projections;
- The Strategic Sites at Stafford and Stone, including the site-selection process, delivery of proposed development, infrastructure requirements and alternative sites considered;
- Habitat Regulations Assessment recommendations for the Cannock Chase SAC, including the nature, extent and means of implementing proposed/likely mitigation measures and consistency of approach with neighbouring authorities;
- Cross-boundary issues, including any other outstanding issues related to housing, employment, retailing, transport, environment, resources, infrastructure etc;
- The implications of the revocation of the West Midlands Regional Strategy.

Response:

The Council considers that all of the evidence has been provided through the Examination Library to support delivery of the Plan for Stafford Borough – Publication (Examination Library Document A1). The Council intends to use this evidence to respond to specific questions raised by the Planning Inspector through brief statements to address the Inspector’s Main Issues and for the hearing sessions.

If the Planning Inspector considers it is appropriate, the Council will prepare a background paper to address the topics listed, for inclusion in the Examination Library, to inform the preparation of hearing statements. The Council will endeavour to produce the background paper by Friday 20 September 2013 at the very latest.

17. Programme Officer

The Inspector is already in contact with the Programme Officer, Sean Roberts. The Council’s team will need to work closely with the Programme Officer in making the arrangements for the examination and hearing sessions. If the Council (or any representor) has any queries about the processes or procedures for the examination, they should not hesitate to contact the Programme Officer.

Response:

Noted. The Council's team will continue to work closely with the Programme Officer in making the arrangements for the Examination and hearing sessions.

18. Web site

The Inspector notes that the Council has already set up an Examination web-page⁴. This should include the name and contact details of the Programme Officer, the name of the Inspector, the date/venue for the hearings/PHM, links to the examination library and list of core documents, copies of the representations, and any material produced by the Council, representors, Inspector and Programme Officer. This will be updated as the examination progresses.

Response:

The Council will ensure that the web-page includes the name and contact details of the Programme Officer, the name of the Inspector, the date / venue for the hearing sessions, links to the Examination Library and the list of core documents, copies of the representations and any material produced by the Council, representors, Inspector and Programme Officer. The Council will update the web-page as the Examination progresses.

19. Note-taking

In order to make efficient progress during the hearing sessions, the Inspector would like the Council to provide an independent note-taker to record the main gist of the discussions. This is not intended as a verbatim record, but to record the key points/agreements/concessions made during the discussions. The note-taker can be a member of the Council's Planning Department (although not someone directly involved in the preparation of the Plan), other departments or an external person. For this purpose, they are an officer of the examination, working under the direction of the Inspector. The Programme Officer can sometimes assist, but he cannot take notes all the time, since he will have other duties during the course of the hearing sessions. ***Can the Council confirm that they will arrange for someone to take notes at the hearing sessions?***

Response:

The Council is currently in the process of arranging for an appropriate person to take notes at the hearing sessions. Details of the appropriate person will be provided to the Planning Inspector in due course.

20. Guidance

The Council should be fully aware of the published national planning policy guidance in the NPPF (March 2012) and on the PAS web-site⁵. The Planning Inspectorate has also produced several guidance notes⁶, which set

⁴ <http://www.staffordbc.gov.uk/examination>

⁵ <http://www.pas.gov.uk/plan-making>

⁶ <http://www.planningportal.gov.uk/planning/planningsystem/localplans>, including

Lessons Learned Examining Development Plan Documents [PINS; June 2007]

Local Development Frameworks: Examining Development Plan Documents: Learning from Experience [PINS; September 2009]

out advice on the nature and process of examining local plans under the LDF regulations. **Can the Council confirm that they are fully aware of this guidance?**

Response:

The Council can confirm that relevant officers are fully aware of the guidance, including in the published NPPF (March 2012) and on the PAS web-site.

21. Future programme

The basic procedure is to set a date for the PHM (if required) and notify representors at least four weeks before of the date. Brief Guidance Notes on the examination process will be circulated by the Programme Officer in the next few weeks, along with the Matters & Issues for examination and draft programme for the hearings. The Council and other participants will be invited to provide brief statements addressing the Inspector's Matters & Issues, to be submitted about two weeks before the hearings commence.

Response:

Noted. The Council will make every effort to comply with the guidance notes and deadlines for statements. The Council does not consider that a Pre Hearing Meeting will be required.

22. Procedure and experiences

The Council may wish to contact representatives of other local authorities to check feedback/experiences of the process and procedure of examining a Core Strategy/Local Plan. The Inspector has examined many development plans, including Core Strategies, Local Plans and other DPDs. He is currently examining the Solihull Local Plan and the Cannock Chase Local Plan (Part 1), is aware of the current examination of the Lichfield Local Plan, and is generally familiar with Stafford Borough and the issues involved.

23. The Inspector would like an initial response to these questions by 6 September 2013, if possible, by adding their responses on this document under the appropriate section. This will then become an examination document.

Response:

The Council has produced an initial response to the questions provided through the Programme Officer, from the Planning Inspector, by the requested deadline of Friday 6 September 2013.

Stephen J Pratt – Development Plan Inspector

21.08.13

APPENDIX 1 - SUMMARY LIST OF REPRESENTATIONS IN POLICY ORDER, INDICATING WHO WISHES TO APPEAR AT THE HEARINGS.

APPENDIX 2 – EXCHANGE OF E-MAIL MESSAGES WITH BARTON WILLMORE

From: Alex Yendole
Sent: 02 September 2013 11:34
To: 'Russell Crow'
Cc: kathryn.ventham@bartonwillmore.co.uk
Subject: RE: Plan for Stafford Borough - Examination

Dear Russell

Many thanks for the message.

Looking forward to hearing from Kathryn on her return, as a matter of urgency.

Kind regards

Alex

From: Russell Crow [<mailto:Russell.Crow@bartonwillmore.co.uk>]
Sent: 02 September 2013 11:32
To: Alex Yendole
Subject: RE: Plan for Stafford Borough - Examination

Alex,

I've had a look internally and am unable to find the technical note referred to; Kathryn is currently on leave this week and we are unlikely to be able to progress this matter until her return.

Regards

Russell Crow
Senior Planner

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From: Gavin Gallagher
Sent: 02 September 2013 10:04
To: Russell Crow
Subject: FW: Plan for Stafford Borough - Examination

As discussed he needs the technical note asap today to send on to the inspector, alternatively if we cannot locate it please advise so he can update the Inspector.

Cheers
Gav

Regards

Gavin Gallagher
Senior Planner

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From: Alex Yendole
Sent: 21 August 2013 16:05
To: 'kathryn.ventham@bartonwillmore.co.uk'
Subject: Plan for Stafford Borough - Examination

Dear Kathryn

My name is Alex Yendole, Planning Policy Manager at Stafford Borough Council.

You may be aware that the Plan for Stafford Borough was submitted for Examination on Tuesday 20 August 2013.

Initial questions have now been received from the Planning Inspector regarding the Examination process.

In February 2013 you submitted a representation to the Plan (attached). The representation made reference to a technical note.

Please could you send through a copy of the technical note as soon as possible so I can forward the material to the Planning Inspector.

Looking forward to hearing from you.

Kind regards

Alex

**APPENDIX 3 – RELEVANT ELECTRONIC MESSAGES DEMONSTRATING
ENGAGEMENT WITH CONSULTEES CONCERNING ADDITIONAL
(MINOR) MODIFICATIONS**

PLAN FOR STAFFORD BOROUGH – PUBLICATION

RESPONSE TO PROPOSED MODIFICATIONS – 5 JULY 2013

SEVERN TRENT WATER (CLEAN)

From: Jones, Mark-Elwyn [mailto:Mark-Elwyn.Jones@severntrent.co.uk]
Sent: 05 July 2013 11:48
To: Alex Yendole
Subject: RE: Plan for Stafford Borough - modifications

Hi Alex, hope your well

The changes are consistent with our findings and proposals.

Kind Regards

Mark Jones Bsc (Hons)
Solution Manager
Asset Creation – Distribution West

Severn Trent Water Ltd
One Supply Chain West
Lamledge Lane
Shifnal, TF11 8SD
Sat Nav = TF11 8BE
T: 01952 468733 M: 07789 904359
F: 01952 468211 E: Mark-Elwyn.Jones@severntrent.co.uk

From: Alex Yendole [mailto:ayendole@staffordbc.gov.uk]
Sent: 05 July 2013 09:24
To: Jones, Mark-Elwyn
Subject: Plan for Stafford Borough - modifications

Dear Mark

Thank you for your representations to the Plan for Stafford Borough – Publication.

Please refer to the attached link to view the Publication version, for information: <http://www.staffordbc.gov.uk/live/Documents/Forward%20Planning/LDF/Publication/Publication-Document.pdf>

I am proposing to deal with your representation numbers PS9 as a recommended modification to Para 7.22 for consideration by the Inspector when the Plan for Stafford Borough is submitted for Examination.

Set out below is a redrafted version of Para 7.22:

'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. , but issues remain concerning the overall resource capacity of supplies from boreholes. Reinforcement work will be necessary to the west of the town via the Peasley Bank reservoir, taking the form of a new 300 mm pipe.

I am proposing to deal with your representation number PS10 as a recommended modification to Policy Stafford 4, criteria xx of the Infrastructure section, as set out below:

'Potable Water - Parts of Stafford town will require reallocation to Peasley Bank Service Reservoir from Butterhill Service Reservoir' reinforcement works for the water supply

Representation number PS11 as a recommended modification to Para 8.20, as set out below:

'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' Information from Severn Trent Water has identified that any "on-site" mains required for particular developments will need to be met by landowners and developers.

Representation number PS12 as a recommended modification to Policy Stone 2, criteria xiv of the Infrastructure section, as set out below:

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

Representation number PS13 as a recommended modification to Para 9.18, as set out below:

'Water Main running through the Ladfordfields site may require diversion to a new route' Main water pipe and reinforcement of the water supply required at Raleigh Hall in order to ensure the development can be achieved

Representation number PS14 as a recommended modification to Para 13.11, as set out below:

'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. and at The strategic location at Stone will require some infrastructure reinforcement to support delivery. It is expected that ~~all identified this~~ reinforcement would be funded by Severn Trent Water and is currently planned for delivery in the period ~~2014-2015, 2011-2015~~ but will be subject to confirmation following an on-going feasibility study, 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.'

I am proposing to deal with your representation number PS15 as a recommended modification to the Table linked to Para 13.24, as set out below:

Water Supply	<u>£2m</u> £4.6m	<u>£1.7m</u> £4.6 m	<u>£1.7m</u> Unknown	Costs subject to on-going feasibility work. Development site infrastructure funded by landowners / developers; off-site infrastructure funded by Severn Trent Water
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Representation number PS16 as a recommended modification to the Table of Appendix D – Stafford Town West Infrastructure Requirements, as set out below:

<p>Potable Water (CRITICAL)</p>	<p>'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'</p> <p>Reinforcement required. Potentially a new main from the local trunk main near Beaconside/ A34 junction to the new developments to allow it to be supplied from Stafford East Control Group, or a new main from the outlet main from Butterhill Direct Supply Reservoir. Subject to ongoing feasibility work by Severn Trent Water.</p>	<p>Unknown <u>2016-20</u></p>	<p><u>£150k</u></p>	<p>Severn Trent (AMP5) will fund off site reinforcement works in full. Developers to fund on-site water mains.</p>
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Representation number PS16 as a recommended modification to the Table of Appendix D – Stafford Town East Infrastructure Requirements, as set out below:

<p>Potable Water (CRITICAL)</p>	<p>Reinforcement of the water supply required.</p> <p><u>'New Water Pumping Station required in the rural area to the East of Stafford Town at Stowe'</u></p>	<p>2011–2015 <u>2021-25</u></p>	<p>£1.7m <u>£150k</u></p>	<p>Severn Trent (AMP5). Developers funds on site mains</p>
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I am proposing to deal with your representation number PS16 as a recommended modification to the Table of Appendix D – Stone Town West and South Infrastructure Requirements, as set out below:

Potable Water (CRITICAL)	Reinforcement of the water supply required. <u>'1.2km of 450mm pipe in A34 Stone required to protect water levels of service in Stone'</u>	2021–2026 <u>2013-15</u>	TBC <u>£1.7m</u>	Severn Trent (AMP5). (AMP6) Developers funds on site mains
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Representation number PS16 as a recommended modification to the Table of Appendix D – Raleigh Hall and Ladfordfields, as set out below:

Potable Water (CRITICAL)	Delete the following words: Reinforcement of the water supply required at Raleigh Hall.	2016-2021	TBC	Severn Trent (AMP6) Developers funds on site mains
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Please could you confirm that there are no outstanding issues about the Plan for Stafford Borough which would raise concerns regarding the soundness of the new Local Plan.

Please could you let me know as soon as possible if you are happy with this approach as we need to finalise our changes by the 12 July 2013.

If you have any queries please do not hesitate to contact me on 01785 619536.

Kind regards

Alex Yendole

SEVERN TRENT WATER – WASTE WATER

5 JULY 2013 – RESPONSE TO MODIFICATIONS E-MAIL MESSAGE

RE: Plan for Stafford Borough – modifications
Hurcombe, Paul Paul.Hurcombe@severntrent.co.uk

Sent: Fri 05/07/2013 10:05
To: Alex Yendole <ayendole@staffordbc.gov.uk>


Alex

I am happy with the proposed re-wording.

As you know from recent discussions with other colleagues with Severn Trent we are already actively working on the long term provision of sewerage capacity for Stafford and will pick up capacity needs for Stone and other areas as the sites come forward. Therefore I can confirm that there are no outstanding issues which would raise concerns regarding the soundness of the new Local Plan.

Paul Hurcombe
Strategist - Infrastructure Capacity
Waste Water Planning & Performance – Infrastructure Strategy
Severn Trent Centre, 2 St John's Street, Coventry, CV1 2LZ.

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 Mobile: 07824 406135
paul.hurcombe@severntrent.co.uk

From: Alex Yendole [<mailto:ayendole@staffordbc.gov.uk>]
Sent: 05 July 2013 09:24
To: Hurcombe, Paul
Subject: Plan for Stafford Borough - modifications

Dear Paul

Thank you for your representations to the Plan for Stafford Borough – Publication.

Please refer to the attached link to view the Publication version, for information: <http://www.staffordbc.gov.uk/live/Documents/Forward%20Planning/LDF/Publication/Publication-Document.pdf>

I am proposing to deal with your representation number PS66 as a recommended modification to Policy 7.21 for consideration by the Inspector when the Plan for Stafford Borough is submitted for Examination.

Set out below is a redrafted version of Para 7.21

~~A key consideration in terms of new housing development in Stafford is alleviation of foul water flows through the current sewerage system, which reaches capacity during storm events due to the combination of foul water and surface water run off within the existing system. Severn Trent Water has concerns about new development impacting on the Lammascote pumping station, which is currently operating close to capacity. The issue is particularly evident between the main sewerage pumping station at Lammascote and the Branscote sewage treatment works east of Stafford, which are connected with a rising main pipe. To solve this issue, Severn Trent Water advise that prior to~~

major residential development north of Stafford it will be necessary to increase the storage capacity within the sewerage system. This significant infrastructure provision will be delivered using new oversized pipes and new storage of foul water at specific locations within the network.

“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 on going to identify the scope of sewerage improvement work to meet the new housing development being allocated across Stafford.”

I am proposing to deal with your representation number PS67 as a recommended modification to Para 8.19, as set out below:

Stone town centre has benefited from schemes to improve surface water run off and separation of foul water. An important consideration in terms of new residential development at Stone will be impacts on the current sewerage system, which reaches capacity during storm events due to the combination of foul water and surface water run off within the existing system. New development to the west of Stone will be required to increase storage capacity at Westbridge Park.

“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 addition 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.”

Representation number PS65 as a recommended modification to Para 13.12 by deleting the existing paragraph and replacing with the following text, as set out below:

“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.” Waste Water Treatment – At this stage Severn Trent Water (STW) consider capacity improvements will be required to accommodate development from all three SDLs in Stafford as well as Stone, with lead in times for delivery of up to 2-3 years, funded by Severn Trent Water.

Representation number PS70 as a recommended modification to the Table linked to Para 13.24, as set out below:

Waste Water Treatment	<u>£5.2m</u> £0.9m	<u>Unknown</u> £0.9m	<u>£5.2m</u> TBC	Severn Trent Water will provide funding for all strategic infrastructure <u>to support delivery of new development.</u> Full costs yet to be determined.
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I am proposing to deal with your representation number PS71 as a recommended modification to the Table of Appendix D – Stafford Town North Infrastructure Requirements, as set out below:

Sewage	<u>Notional modelling indicate sewerage capacity improvements will be required to accommodate additional foul flows from sites housing at Beaconside and North Stafford.</u> Works, to be confirmed by further hydraulic modelling.	Lead time of 3 years	£300,000 (tbc) <u>£5.2m identified for all SDLs at Stafford and Stone. Investment allocated when new development is delivered.</u>	Not in current AMP
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Representation number PS72 as a recommended modification to the Table of Appendix D – Stafford Town West Infrastructure Requirements, as set out below:

Sewage	<u>Notional modelling indicate sewerage capacity improvements will be required to accommodate additional foul flows from sites at West Stafford.</u> Reinforcement works, to be confirmed by further hydraulic	Lead time of 3 years	£570,000 (tbc) <u>£5.2m identified for all SDLs at Stafford and Stone. Investment allocated when new development is delivered.</u>	Severn Trent Water (AMP6)
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modelling.			
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Representation number PS73 as a recommended modification to the Table of Appendix D – Stafford Town East Infrastructure Requirements, as set out below:

Sewage	<p><u>Notional modelling indicate sewerage capacity improvements will be required to accommodate additional foul flows from sites at East Stafford.</u></p> <p>Topography of the site suggests it will drain to a terminal sewage pumping station known as 'Beaconside' which pumps directly to Brancote sewage treatment works. There are known flooding problems in the vicinity of this pumping station and so capacity improvements may be required at this sewage pumping station to accommodate additional flows from the proposed 600 additional dwellings in this location</p>	Lead time of 3 years	<p>TBC <u>£5.2m identified for all SDLs at Stafford and Stone. Investment allocated when new development is delivered.</u></p>	Not in current AMP
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Representation number PS74 as a recommended modification to the Table of Appendix D – Stone Town West and South Infrastructure Requirements, as set out below:

<p>Sewage (CRITICAL)</p>	<p><u>Notional modelling indicate additional flows from housing is not expected to have significant impact on sewer capacity with foul flows draining to an existing sewage pumping station at Westbridge Park. Capacity issues are not envisaged with the new employment area due to the proximity of the sewage treatment works.</u></p> <p>Waste-water infrastructure investment. There are known flooding problems in the vicinity and so capacity improvements may be required to accommodate additional flows from the proposed 500 additional dwellings in this location</p>	<p>Lead time of 3 years</p>	<p>TBC <u>£5.2m identified for all SDLs at Stafford and Stone. Investment allocated when new development is delivered.</u></p>	<p>Not in current AMP</p>
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Please could you confirm that there are no outstanding issues about the Plan for Stafford Borough which would raise concerns regarding the soundness of the new Local Plan.

Please could you let me know as soon as possible if you are happy with this approach as we need to finalise our changes by the 12 July 2013.

If you have any queries please do not hesitate to contact me on 01785 619536.

Kind regards

Alex Yendole

PLAN FOR STAFFORD BOROUGH – PUBLICATION

PROPOSED MODIFICATIONS SOUTH STAFFORDSHIRE DISTRICT RESPONSE (JULY 2013)

From: Harris, Kelly [mailto:k.harris@sstaffs.gov.uk]
Sent: 08 July 2013 17:24
To: Alex Yendole; Johnson, Andrew
Subject: RE: Plan for Stafford Borough - modification

Dear Alex,

Many thanks for the email regarding modifications to the Plan for Stafford Borough in relation to our representation. Andy and I have discussed this and we are happy with the changes you propose to paragraph 3.12. Let me know if you need a formal letter from me to confirm.

Regards,

Kelly Harris
Local Plans Team Leader
South Staffordshire Council

From: Alex Yendole [ayendole@staffordbc.gov.uk]
Sent: 05 July 2013 08:08
To: Johnson, Andrew
Cc: Harris, Kelly
Subject: Plan for Stafford Borough - modification

Dear Andy

Thank you for your representations to the Plan for Stafford Borough – Publication.

Please refer to the attached link to view the Publication version, for information: <http://www.staffordbc.gov.uk/live/Documents/Forward%20Planning/LDF/Publication/Publication-Document.pdf>

I am proposing to deal with your representation number PS148 as recommended modifications to Para 3.12 for consideration by the Inspector when the Plan for Stafford Borough is submitted for Examination.

Set out below is a redrafted version of Para 3.12:

“A number of cross-border relationships and issues have been highlighted through the West Midlands RSS process and subsequently progressed with neighbouring authorities and other key partners. As part of the West Midlands Regional Spatial Strategy review process, which was never completed but progressed to an Examination in Public from April to June 2009, and an Panel Report published in September 2009 new development requirements for the Stafford Borough area through until 2026 were presented, together with a focus of future development on Stafford town. In addition, The West Midlands RSS evidence base highlighted a requirement to provide a new 50 hectare Regional Logistics Site with access to multi-modal transport facilities to serve the Black Country, to be located in southern Staffordshire. 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.” 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.~~

Please could you confirm that there are no outstanding issues about the Plan for Stafford Borough which would raise concerns regarding the soundness of the new Local Plan.

Please could you let me know as soon as possible if you are happy with this approach as we need to finalise our changes by the 12 July 2013.

If you have any queries please do not hesitate to contact me on 01785 619536.

Kind regards

PLAN FOR STAFFORD BOROUGH – PUBLICATION

PROPOSED MODIFICATIONS STAFFORDSHIRE COUNTY COUNCIL TRANSPORT (JULY 2013)

From: Chell, Annabel (Place) [mailto:annabel.chell@staffordshire.gov.uk]
Sent: 10 July 2013 13:25
To: Alex Yendole
Cc: Dawson, Nick (Place)
Subject: Plan for Stafford Borough - transport modifications

Hi Alex,

Please see my comments below in red.

We also recommended in our representation that you should delete the costs quoted in paragraph 13.24 relating to highway, pedestrian and cycle infrastructure. We do not know how these costs have been identified. We do not think that they are correct current estimates and we will not be able to agree with them at the Hearing. Costs should only be quoted in the Infrastructure Plan as they are not constant and require an annual review.

You also need to amend the last bullet point in paragraph 13.23 to read:

'Stafford Western Access Improvements, Stafford Northern Access Improvements and Stafford Eastern Access Improvements'.

Regards,

Annabel

From: Dawson, Nick (Place)
Sent: 05 July 2013 11:15
To: Chell, Annabel (Place)
Subject: FW: Plan for Stafford Borough - transport modifications

Nick Dawson
Connectivity Strategy Manager
Transport and the Connected County
Staffordshire County Council
No 1 Staffordshire Place
Stafford ST16 2LP

Tel 01785 276629

nick.dawson@staffordshire.gov.uk
www.staffordshire.gov.uk

From: Alex Yendole [<mailto:ayendole@staffordbc.gov.uk>]
Sent: 05 July 2013 10:48
To: Parkinson, Mark (Place)
Cc: Dawson, Nick (Place)
Subject: Plan for Stafford Borough - transport modifications

Dear Mark

Thank you for your representations to the Plan for Stafford Borough – Publication.

Please refer to the attached link to view the Publication version, for information: <http://www.staffordbc.gov.uk/live/Documents/Forward%20Planning/LDF/Publication/Publication-Document.pdf>

I am proposing to deal with your representation number PS442 as a recommended modification to Policy Stafford 1, housing section, amend criteria ii c. for consideration by the Inspector when the Plan for Stafford Borough is submitted for Examination.

~~“East of Stafford linked to delivery of Phase 1 of the Eastern Distributor Road from Weston Road / Beaconside to Baswich Lane road bridge at St Thomas Lane.”~~ - agree

Representation number PS440 as a recommended modification to Policy Stafford 1 amend criteria ii in the Infrastructure section to read as follows:

~~‘Deliver the full Western Access Improvements, (delete ‘scheme’) including the Western Access Route, between Martin Drive and A34 Foregate Street, the Northern Access Improvements and Eastern Access Improvements, including the Eastern Distributor Road from Beaconside to St Thomas Lane.’ Phase 1 of the Eastern Distributor Road from Weston Road / Beaconside to Baswich Lane road bridge at St Thomas’~~

Representation number PS440 as a recommended modification to Paragraph 7.3 amended last sentence to read:

~~‘Beaconside Road whilst housing provision west of Stafford is close to the town centre for accessible employment opportunities, as well as access to the national railway network via Stafford railway station and supported by the proposed Western Access Improvements.’ (you don’t need to mention EDR here)~~

Representation number PS440 as a recommended modification to Policy Stafford 4 by replacing criteria xv, xvii & xiv of the policy with the following new criteria as follows:

~~“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 (delete reference to ‘Phase 1’) the Eastern Distributor Road between Beaconside and St. Thomas Lane, sustainable transport access, potential highway capacity improvements and 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” (I have removed reference to developers funding the Blackheath junction because we have now got Local Pinch Point Funding for this)~~

You need to keep criteria xiv in and just delete this last bit: '.....and improvements to transport capacity along the A518 Weston Road in the vicinity of the University roundabout and along the Tixall Road

Re-categorise subsequent criteria as necessary.

Representation number PS440 as a recommended modification to paragraph 7.35 amend the first bullet point, second line to read as follows:

'The Eastern Access Improvements including transport improvements **(delete the word 'required')** along A513 Beaconside **and** A518 Weston Road **(delete 'roundabout'), the Eastern Distributor Road from Beaconside to St Thomas Lane** together with principal access to the sites,' ~~(Beaconside extension — Weston Road to Baswich Lane road bridge).~~

Representation number PS441 as a recommended modification to paragraph 10.5 by deleting the last sentence of the paragraph as follows: ~~'Staffordshire County Council currently identifies a number of protected routes within Stafford Borough as shown on the Policies Map'~~

Amend Policies Map to show key infrastructure east of Stafford from Beaconside to Baswich Lane railway bridge roundabout junction. **Please can you send the amended Policies Map for us to check?**

Please could you confirm that there are no outstanding issues about the Plan for Stafford Borough which would raise concerns regarding the soundness of the new Local Plan.

Please could you let me know as soon as possible if you are happy with this approach as we need to finalise our changes by the 12 July 2013.

If you have any queries please do not hesitate to contact me on 01785 619536.

Kind regards

Alex Yendole

PLAN FOR STAFFORD BOROUGH – PUBLICATION

ENVIRONMENT AGENCY – PROPOSED MODIFICATIONS RESPONSE (JULY 2013)

From: Field, Jane [mailto:jane.field@environment-agency.gov.uk]

Sent: 11 July 2013 16:28

To: Alex Yendole

Cc: Dingley, John; Smith, Lucy J

Subject: RE: Plan for Stafford Borough - modifications

Hi Alex

Thank you for referring these proposed modifications, we appreciate the work put in to make these changes in line with our advice and consider them sufficient to address the issues raised. Please see any comments highlighted in red below.

We note that there are a number of recommendations put forward within our letter of 26 February in response to your pre-submission draft that have not been taken into account. These include:

- Mention of drought as impact of climate change in Key Issues
- Additional text in Stafford policies 3 & 4 to elaborate on the type of flood alleviation expected on these sites
- Highlight of hydropower impact on the environment (Policy N3)
- Requirement for a developer to demonstrate that there is adequate capacity available within the receiving foul drainage system prior to the occupation of the scheme (Policy N4 (j))
- Strengthening of N4 Point G relating to culverted channels
- Consideration of fish passes (N4 Point J)
- The benefits of an overarching WFD policy

Of particular concern is the absence of a policy requiring that developers submit confirmation from STW that connection into the mains foul drainage system would not pose a risk of pollution to the water environment. This pollution may occur as a result of the discharge of unconsented waters from overloaded sewage treatment works. It should be made clear that it may be necessary for development to be delayed until the required improvements to the drainage infrastructure have been put in place. This information should be available upon determination of any planning application to ensure that appropriate time-limited conditions are imposed on the decision notice. (Policy N4 part J).

These are all issues which are recommendations for improvement only, and would not affect the soundness of your plan. We do however reiterate this advice as we feel it would be of benefit to the plan's effectiveness in protecting the environment and ensuring compliance with EU Directives.

If you have any queries please feel free to contact me.

Regards

Jane Field
Planning Specialist
Sustainable Places

Midlands – Central Area



01543 404878 (Internal 722 – 4878)



jane.field@environment-agency.gov.uk



Environment Agency, 9 Wellington Crescent, Fradley Park, Lichfield, Staffordshire, WS13 8RR



We are changing how we give planning advice...

We will continue to provide a free standard level of pre-applications advice on planning issues to all developers regardless of the scale and complexity of development. Where there are significant issues to be resolved we will offer a charged service for further detailed advice.

For more information please contact the Sustainable Places team at midscentralplanning@environment-agency.gov.uk

From: Alex Yendole [<mailto:ayendole@staffordbc.gov.uk>]

Sent: 05 July 2013 10:03

To: Smith, Lucy J

Subject: Plan for Stafford Borough - modifications

Dear Lucy

Thank you for your representations to the Plan for Stafford Borough – Publication.

Please refer to the attached link to view the Publication version, for information: <http://www.staffordbc.gov.uk/live/Documents/Forward%20Planning/LDF/Publication/Publication-Document.pdf>

I am proposing to deal with your representation number PS387 & PS388 as recommended modifications to Para 5.1 – Spatial Vision for consideration by the Inspector when the Plan for Stafford Borough is submitted for Examination.

Add an additional criteria under criteria m. to read as follows:

'n. provided new green infrastructure / biodiversity enhancement schemes'

Add an additional criteria under criteria p. to read as follows:

'q. provided new green infrastructure / biodiversity enhancement schemes'

Add an additional criteria under criteria q. to read as follows:

'r. Avoided development in flood risk areas' THIS ADDITION IS WELCOMED, BUT SHOULD IT ALSO BE REFLECTED WITHIN SECTION 5.2 – MAYBE AS PART OF AN AMENDMENT TO POINT 19?

Re-categorise all subsequent criteria.

Representation number PS389 as recommended modification to the Stafford Town Key Diagram

Insert the River Sow and River Penk in the Stafford Town Key Diagram.

Representation number PS389 as recommended modification to Policy Stafford 1 by adding a criteria under the Environment section to read:

'v. Ensuring that new development does not harm but enhances watercourses in the town'

Representation number PS390 as recommended modification to Policy Stafford 2 by amending criteria iv under the Environment section to read:

~~'A comprehensive drainage and flood-management scheme will be delivered to enable development of the Strategic Development Location which will include measures to alleviate flooding downstream and improve surface-water-management on the Marston Brook and Sandyford Brook'~~

Representation number PS391 as recommended modification to Policy Stafford 2 by amending criteria vii under the Environment section to read:

~~'A comprehensive drainage and flood-management scheme will be delivered to enable implement development of the Strategic Development Location which will include measures to alleviate flooding downstream and improve surface-water-management on Doxey Brook and tributaries to the River Sow;'~~
POLICY STAFFORD 2 (VII) RELATES TO GI - ASSUME YOU MEAN POLICY STAFFORD 3 (VII).

Representation number PS391 as recommended modification to Policy Stafford 2 by amending criteria xii under the Environment section to read:

~~'Provision of a network of multi-functional green infrastructure taking into account existing on-site features, such as hedgerows, tree lines, drainage ditches, archaeological remains, culverted watercourses traversing the site and Public Rights of Way with play areas and green corridors allowing wildlife movement and access to open space;'~~
ASSUME YOU MEAN POLICY STAFFORD 3 CRITERIA (XII)

Representation number PS391 as recommended modification to Paragraph 7.29 to read:

Development to the west of Stafford is located south west of Stafford town centre across the main West Coast mainline, beyond the main residential areas to the west of the town and the M6 motorway. The key housing areas are to be located north of the A518 Newport Road, Stafford Castle and the golf course. The area will have implications for the Cannock Chase Special Area of Conservation which will require mitigation measures to address the recreational impacts of the new development and the component of the site that floods.'

Representation number PS392 as recommended modification to Policy Stafford 4 by amending criteria viii under the Environment section to read:

~~'A comprehensive drainage and flood-management scheme will be delivered to enable development of the Strategic Development Location which will include measures to alleviate flooding downstream and improve surface-water-management on the River Sow'~~

Representation number PS393 as recommended modification to Para 8.8 to read:

'The Strategic Flood Risk Assessment for Stafford Borough was completed and published in February 2008, which identified the extent of the floodplain affecting the urban area of Stone. These floodplain areas do have a significant role to play in terms of green infrastructure. No new development should take place on low-lying land adjacent to the River Trent due to water resource and flood risk implications'

Representation number PS394 as a recommended modification to Policy N1 by adding a new criterion under the 'Space' heading to read:

'Where appropriate development should ensure that there is space for water within the development layout to facilitate the implementation of Sustainable Drainage Systems (SuDs)'

Re-categorise all remaining criteria.

Representation number PS395 as recommended modifications to Policy N2 as follows:

Amend bullet point 1 under the 'Sustainable Drainage' heading to read:

'Discharge clean roof water to ground via infiltration techniques such as soakaways, unless demonstrated by an infiltration test that due to ground conditions or underlying contamination, this is not possible'

Under the Sustainable Drainage heading amend the second sentence of the second paragraph to read: 'Groundwater resources and surface standing water bodies will be ...'

Under the Sustainable Drainage head add the following sentence at the end of the second paragraph to read: 'Any development that could lead to the degradation of the Water Framework Directive (WFD) status of the waterbody should not be permitted'

Representation number PS397 as recommended modifications to Policy N2 as follows:

<u>Water Framework Directive (WFD)</u>	<u>The Water Framework Directive (Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy) is a European Union directive which commits European Union member states to achieve good qualitative and quantitative status of all water bodies (including marine waters up to one nautical mile from shore) by 2015.</u>
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Please could you confirm that there are no outstanding issues about the Plan for Stafford Borough which would raise concerns regarding the soundness of the new Local Plan.

Please could you let me know as soon as possible if you are happy with this approach as we need to finalise our changes by the 12 July 2013.

If you have any queries please do not hesitate to contact me on 01785 619536.

Kind regards

PLAN FOR STAFFORD BOROUGH – PUBLICATION

HIGHWAYS AGENCY RESPONSE – PROPOSED MODIFICATIONS (JULY 2013)

From: Pinnock, Samantha [mailto:Samantha.Pinnock@highways.gsi.gov.uk]
Sent: 11 July 2013 12:24
To: Alex Yendole
Subject: RE: Plan for Stafford Borough - modifications

Good afternoon Alex,

Please find attached the final version of the M6 Modelling Report.

Thank you for incorporating the suggested amendments I can also confirm that there are no outstanding issues about the Plan for Stafford which would raise concerns regarding the soundness of the new Local Plan.

Please do not hesitate to contact me if you wish to discuss further.

Best Regards

Sam

From: Alex Yendole [mailto:ayendole@staffordbc.gov.uk]
Sent: 05 July 2013 08:26
To: Pinnock, Samantha
Subject: Plan for Stafford Borough - modifications

Dear Sam

Thank you for your representations to the Plan for Stafford Borough – Publication.

Please refer to the attached link to view the Publication version, for information: <http://www.staffordbc.gov.uk/live/Documents/Forward%20Planning/LDF/Publication/Publication-Document.pdf>

Please could you send through the final version of the M6 modelling report for Junctions 13 & 14 so this can be added to the evidence base. I attached the latest copy I have on record.

I am proposing to deal with your representation number PS575 as a recommended modification to Policy T1, criteria b for consideration by the Inspector when the Plan for Stafford Borough is submitted for Examination.

Set out below is a redrafted version of Policy T1, criteria b to read:

“b. Requiring new developments to produce Transport Assessments and Travel Plan, **where appropriate,** including **maximising the use** ~~consideration~~ of public transport, as well as facilitating the provision of safe and well integrated off-street parking.”

The following amendment is being proposed to Paragraph 10.6 as a new sentence at the end of the paragraph to read:

'Development that would generate large levels of traffic should have good access links to the main transportation networks in the Borough to avoid long distance trips that would potentially increase the overall levels of congestion on the road network. Furthermore, it is also critical for safety reasons that new developments do not generate increased usage of heavy goods vehicles along roads which are unequipped for such traffic. **New development should be sustainable and be able to demonstrate that any impact on the network can be sufficiently accommodated, as demonstrated by evidence based testing**'

Please could you confirm that there are no outstanding issues about the Plan for Stafford Borough which would raise concerns regarding the soundness of the new Local Plan.

Please could you let me know as soon as possible if you are happy with this approach as we need to finalise our changes by the 12 July 2013.

If you have any queries please do not hesitate to contact me on 01785 619536.

Kind regards

Alex Yendole

PLAN FOR STAFFORD BOROUGH – PUBLICATION

PROPOSED MODIFICATIONS RESPONSE STAFFORDSHIRE COUNTY COUNCIL (JULY 2013)

From: Alex Yendole
Sent: 17 July 2013 11:37
To: 'Christelow, Andy (Place)'
Subject: RE: Plan for Stafford Borough - waste modifications

Andy

Many thanks

Alex

From: Christelow, Andy (Place) [<mailto:andy.christelow@staffordshire.gov.uk>]
Sent: 17 July 2013 11:27
To: Alex Yendole
Subject: RE: Plan for Stafford Borough - waste modifications

Alex,

Your proposed amendments for both **Policy Stafford 1** and **Policy Stone 1** are absolutely fine.

The amendment avoid any (unintentional) restriction on the use of employment land for compatible waste developments, which would have conflicted with the Staffordshire and Stoke-on-Trent Joint Waste Local Plan.

The wording also seems to represent a clearer and more concise statement of what you are trying to achieve through the policy, so that should be an advantage as well.

Thanks for your help in sorting this, and I wish you well with the forthcoming examination.

Andrew Christelow

Senior Planning Officer, Planning, Policy & Development Control,
Staffordshire County Council

Tel: 01785 276705
andy.christelow@staffordshire.gov.uk
www.staffordshire.gov.uk

From: Alex Yendole [<mailto:ayendole@staffordbc.gov.uk>]
Sent: 17 July 2013 10:46
To: Christelow, Andy (Place)
Subject: RE: Plan for Stafford Borough - waste modifications

Hi Andy

Thanks for the message.

Does the following amendment to Policy Stafford 1 criteria vii address your concerns. If not please insert the text you require below and send back to me as soon as possible.

Amend criteria vii. to read as follows:

"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."

Delete the following text in criteria 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.'~~

Similarly for Policy Stone 1 please let me know any amendments to the following proposed modification:

Stone Town Centre section.

Insert the following paragraph under the criteria list:

"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."

Delete the following paragraph

~~'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.'~~

Many thanks

Alex

From: Christelow, Andy (Place) [mailto:andy.christelow@staffordshire.gov.uk]

Sent: 12 July 2013 14:54

To: Alex Yendole

Subject: RE: Plan for Stafford Borough - waste modifications

Alex,

Thank you for sending me your proposed modifications to address the issues that I raised. My comments are as below:

Recommended modification to deal with representation number PS438

The text is broadly satisfactory, but as you are dealing with both mineral and waste resources, you should refer to both mineral and waste local plans. Suitable text modifications are suggested below:

" ... as defined in the Minerals and Waste Local Plans prepared by the Mineral and Waste Planning Authority. In due course the Policies Map will be updated with relevant Mineral-Local Plan allocations and designations."

Recommended modification to deal with representation number PS438.

The wording of the proposed modification is much as I would have expected, but I am unclear how it would work in the location suggested.

As I read the policy, the section on development or conversions not resulting in loss of employment land would not limit the development of waste uses on employment land as they do generate employment, so the modification is not required there. However, point vii of the section of Stafford Town Centre does restrict the use of employment land to specific use classes, and thereby excludes waste uses (which are *sui generis*). It is here that the modification is required to avoid conflict with the Waste Local Plan.

Recommended modification to deal with representation number PS436.

As above, the wording of the proposed modification is much as I would have expected, but I am unclear how it would work in the location suggested. The wording where the insertion is proposed would not hamper the development of waste uses on employment land. However, the paragraph below point f. of the section on Stone Town Centre does restrict the use of employment land to specific use classes, and thereby excludes waste uses (which are *sui generis*). It is here that the modification is required to avoid conflict with the Waste Local Plan.

Recommended modification to deal with representation number PS437.

The proposed modification is fine.

I hope that the comments are reasonably self-explanatory, but will be happy to discuss them with you if that is helpful. Meanwhile, I wish you well with the progress of the plan.

Andrew Christelow

Senior Planning Officer, Planning, Policy & Development Control,
Staffordshire County Council

Tel: 01785 276705

andy.christelow@staffordshire.gov.uk

www.staffordshire.gov.uk

From: Alex Yendole [ayendole@staffordbc.gov.uk]
Sent: 05 July 2013 10:47
To: Parkinson, Mark (Place)
Cc: Christelow, Andy (Place)
Subject: Plan for Stafford Borough - waste modifications

Dear Mark

Thank you for your representations to the Plan for Stafford Borough – Publication.

Please refer to the attached link to view the Publication version, for information: <http://www.staffordbc.gov.uk/live/Documents/Forward%20Planning/LDF/Publication/Publication-Document.pdf>

I am proposing to deal with your representation number PS438 as a recommended modification to add a new paragraph under Para 6.66 for consideration by the Inspector when the Plan for Stafford Borough is submitted for Examination.

"In addition to the above, new development proposals should not lead to the sterilisation of significant mineral resources, or compromise the continued operation or expansion of any existing waste management facilities as defined in the Minerals Local Plan prepared by the Mineral Planning Authority. In due course the Policies Map will be updated with relevant Mineral Local Plan allocations and designations."

Representation number PS438 as a recommended modification to Policy Stafford 1 under the Employment section amend bullet point 1 to read:

"1. It is a comparable waste management use or there is overriding ..."

Representation number PS436 as a recommended modification to Policy Stone 1 under the Employment section amend bullet point 1 to read:

"1. It is a comparable waste management use or there is overriding ..."

Representation number PS437 as a recommended modification to Policy E3 amend criteria a. to read as follows:

"a. Light industrial (B1), excluding offices, general industrial (B2), storage and distribution (B8), or similar and compatible waste management uses;"

Please could you confirm that there are no outstanding issues about the Plan for Stafford Borough which would raise concerns regarding the soundness of the new Local Plan.

Please could you let me know as soon as possible if you are happy with this approach as we need to finalise our changes by the 12 July 2013.

If you have any queries please do not hesitate to contact me on 01785 619536.

Kind regards

Alex Yendole

PLAN FOR STAFFORD BOROUGH – PUBLICATION

**PROPOSED MODIFICATION RESPONSE CANNOCK CHASE A.O.N.B. UNIT
(JULY 2013)**

From: CLIVE KEBLE [mailto:clive.keble@btopenworld.com]
Sent: 10 July 2013 16:58
To: Alex Yendole
Cc: Ruth Hytch (AONB); Anne Walker (AONB)
Subject: Stafford Local Plan - AONB Representations

Alex,

I refer to your email to Ruth Hytch dated 5th July and to our earlier telephone conversation, both of which concerned the above.

I can confirm that, on behalf of the AONB Joint Committee, Ruth and I are happy with the proposed amendments to policy N7. We note that the additional clause (h) which was suggested in our representation, derived from the existing local plan, may be viewed as being unduly negative in the context of the NPPF and that it cannot, therefore, be included in the new plan.

We also note that you are involving Natural England (NE) in a re-drafting of Policy N6 on the SAC. As discussed, I would be grateful if you could let me have a copy of the emerging policy so that I can consider how it relates to the AONB as a whole and to Policy N7. I note, however, that the safeguarding for the AONB which we sought through additional wording, as set out in the representation on that policy, may well be provided by your proposed amendment to policy N6. That being the case, it is unlikely that we will wish to make any formal representation on the SAC (Policy N7), as amended by NE.

Thank you

Clive Keble (on behalf of Ruth Hytch – AONB Officer)

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**APPENDIX 4 – STATEMENT OF COMMON GROUND WITH NATURAL
ENGLAND (DATED 23 APRIL 2013)**

The Plan for Stafford Borough – Submission

Statement of Common Ground between Stafford Borough Council (SBC) and Natural England (NE) April 2013

1. Introduction

This Statement of Common Ground relates to:

- Representations PS 417 – PS 429. Representations HRA1 and Representation CCSAC1
- A meeting held between SBC and NE on 9th April 2013 regarding the representations made by NE to The Plan for Stafford Borough – Publication

Agreement to the contents herein does not prohibit NE or SBC from making further comments as part of The Plan for Stafford Borough – Examination

2. Background

- On 28th February NE submitted written responses to the Plan for Stafford Borough. NE objected to the Plan, in particular the conclusion that the Plan would not result in Adverse Effects on the Integrity of Cannock Chase SAC.
- NE suggested amendments to various policies and the associated Habitat Regulations Assessment Report to overcome the objection
- NE also raised comments relating to the policy approach to environmental protection and enhancement and suggested amendments to address the concerns.
- NE provided support for policies N7 (Cannock Chase AONB) and N8 (Landscape Character)

3. Agreed modifications to address representations

In order to address the concerns of NE, the Council has taken the following action:

- Proposed several changes to the Plan, in particular to:
 - Paragraph 2.14
 - Paragraph 3.9
 - Policy Stone 1 and 2
 - Policy N4
 - Paragraph 12.25
 - Paragraph 12.37
 - Policy N5
 - Paragraph 12.38
 - Paragraph 12.39
 - Policy N6
 - Table in Section 13
 - Glossary
- Produced this Statement of Common Ground to be signed by NE and SBC representing agreement on the suggested amendments. This Statement of Common Ground will be provided to the Inspector alongside The Plan for Stafford Borough – Submission.
- Amended the two Habitat Regulations Assessment Reports to be submitted alongside The Plan for Stafford Borough

A schedule of the suggested modification and NE representation to which they relate is below:

Rep No / Respondent	Section	Summary of rep	Changes requested	Council Response
PS 417 Natural England	Policy Stone 1	Stone is within the zone of influence for Cannock Chase SAC	Policy should make reference to mitigation for Cannock Chase SAC	Policy to make reference to mitigation for Cannock Chase SAC
PS 418 Natural England	Policy Stone 2	Stone is within the zone of influence for Cannock Chase SAC	Policy should make reference to mitigation for Cannock Chase SAC	Policy to make reference to mitigation for Cannock Chase SAC
PS 419 Natural England	Policy C7	The policy does not include information on SANGS	Advise cross reference to policy N6	Consider SANGS and Open space, sport and recreation to be separate policy requirements and therefore should be kept separate. The document states that all policies should be read as a whole
PS 420 Natural England	Policy N5	<p>Supports the intent of the policy but does not consider as worded to be sound or legally compliant.</p> <ul style="list-style-type: none"> • References to HRA can be misleading. • Omission of alternatives and reasons of overriding public interest • Incorrect statement about HRA in supporting text • Clarity regarding air quality in relation to Cannock Chase SAC • Concern that points 2 and 3 place too much onus on the applicant to deliver mitigation • Confidence needed in the delivery of mitigation, particularly policy support of the Local Transport Plan. 	Delete word "unauthorised" and insert "protected species or any species or habitat of principal importance for nature conservation" but this does not do enough to promote the protection and enhancement of habitats and species outside of designated nature sites. NPPF requires planning polices to promote the preservation, restoration and re-creation of priority habitats and the recovering of priority species populations – insert words to this effect.	Modifications suggested to Policy N5 and its supporting text.

PS 421 Natural England		<p>Supports the intent of the policy but does not consider as worded to be sound or legally compliant.</p> <ul style="list-style-type: none"> • Do not refer to distances but a general 'zone of influence' • Supporting text needs to make reference to on-going work • Policy needs to include a hook for CIL or developer contributions • Further information required as to where developers can get further information • Amend sentence 12.39 regarding role of NE 		Amendments to policy N6 and its supporting text
PS 422	Spatial Portrait	Would like a more joined up approach throughout the plan in relation to European legalisation	Environment section to mention Cannock Chase SAC	Amendments to paragraph 2.14
PS 423	Paragraph 3.9	Reference to HRA Directive is not correct	Replace word 'Directive' with the word 'Assessment'	Amendment to paragraph 3.9
PS 424	Paragraph 12.23	There are references which are out of date – particularly Regionally Important Geological Sites.	Make change to read Local Geological Sites, explicit reference to preserve, restore and recreate property habitats and aid the recovery of priority species and inclusion of reference to the Green Infrastructure Strategy	Amendment to Policies N4, N5 and paragraph 12.25
PS 425	Policy N4		Recommend inclusion of Green Infrastructure Strategy into policy	Green Infrastructure included in policy N4
PS 426	Policy N7	Support the policy		No amendment necessary
PS 427	Policy N8	Support the policy		No amendment necessary

PS 428	Policy I1		Welcome clarification that environment infrastructure includes SAC mitigation	Consider that there is sufficient reference to SAC mitigation in paragraphs 13.16 and 13.17. Amendments to table in 13.24 to make specific reference to SAC Mitigation.
PS 429	Glossary		Recommend adding definition of Suitable Alternative Natural Greenspaces	SANGS included in glossary

There is one representation, PS 419 where SBC has not agreed to a modification. Following discussion between SBC and NE on the 9th April, it was discussed that the issue of SANGS is adequately addressed within the plan and NE agreed that this addresses their concern.

**APPENDIX 5 - RESPONSE FROM NATURAL ENGLAND REGARDING
APPROPRIATE ASSESSMENT UNDER THE HABITAT REGULATIONS
INCLUDING THE APPROACH TO THE CANNOCK CHASE SPECIAL AREA OF
CONSERVATION**

Date: 30 August 2013
Our ref: 6845 – Stafford Local Plan
Your ref: Local Plan Examination



Mr Alex Yendole
Planning Policy Manager
Stafford Borough Council
BY EMAIL ONLY

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

T 0300 060 3900

Dear Alex

Stafford Borough Local Plan - Cannock Chase SAC - Appropriate Assessment under the Habitat Regulations

Thank you for your email on the above dated 22 August 2013 which was received by Natural England the same day.

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

Natural England notes the Planning Inspector's question as follows:

Can the Council confirm whether there are any outstanding issues relating to the Appropriate Assessment under the Habitat Regulations and other reports, and whether Natural England and other relevant bodies are satisfied with the approach, including the approach to the Cannock Chase Special Area of Conservation?

Natural England confirms that our advice regarding Cannock Chase SAC is reflected in the Statement of Common Ground and our most recent letter on the subject of local plan revisions including Habitats Regulations Assessment (dated 23 May 2013). No additional matters relating to Cannock Chase SAC are outstanding at the time of writing.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact me on 0300 060 1640. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Antony Muller
Lead Adviser, Natural England Land-use operations team

Date: 23 May 2013
Our ref: 85537
Your ref: Stafford HRA



Alex Yendole
Planning Policy Manager
Stafford Borough Council

ayendole@staffordbc.gov.uk

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

T 0300 060 3900

BY EMAIL ONLY

Dear Mr Yendole

Planning Consultation: The Plan for Stafford Borough – Revised Habitats Regulations Assessment

Thank you for your consultation on the revised Habitat Regulations Assessment (HRA) reports for All Sites and Cannock Chase which was received by Natural England on 02 May 2013

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

Natural England has reviewed both of the revised HRA reports and generally considers that the amendments that you have made are acceptable. We do however note that in the HRA report for All Sites that our recommendation for Task 4: *Assessing the significance of any effects*, could be improved by providing increased explanation around "source-pathway-receptor", has only been followed for the Chartley Moss site which was included in the specific example provided in our response. Our intention was that this expanded explanation should be included for all sites which would lead to increased justification for the report's conclusions.

We would add however that we are satisfied with the amendments to the Local Plan policies that have been agreed and we consider that on balance that the HRA reports can be considered acceptable.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Hayley Pankhurst on 0300 060 1594. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

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

Yours faithfully,

Hayley Pankhurst

Lead Adviser
Land Use Operations
Tel: 0300 060 1594

APPENDIX 6 – RESPONSE FROM THE ENVIRONMENT AGENCY REGARDING STRATEGIC FLOOD RISK ASSESSMENT AND WATER MANAGEMENT

From: Alex Yendole
Sent: 02 September 2013 09:31
To: 'Field, Jane'
Subject: RE: Stafford Borough - Examination Initial Questions

Dear Jane

Many thanks for the message and confirmation about outstanding issues.

Kind regards

Alex

From: Field, Jane [<mailto:jane.field@environment-agency.gov.uk>]
Sent: 23 August 2013 16:18
To: Alex Yendole
Subject: RE: Stafford Borough - Examination Initial Questions

Hi Alex

Thanks for your email.

I can confirm that the Environment Agency have no outstanding issues relating to the flood risk evidence base, and have worked in partnership with Stafford Borough Council in the development of this plan. In light of this we consider the plan to be sound.

If you need anything further from us please let me know.

Jane Field
Planning Specialist
Sustainable Places
Midlands – Central Area

 01543 404878 (Internal 722 – 4878)
 jane.field@environment-agency.gov.uk
 Environment Agency, 9 Wellington Crescent, Fradley Park, Lichfield, Staffordshire, WS13 8RR



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From: Alex Yendole [mailto:ayendole@staffordbc.gov.uk]
Sent: 22 August 2013 15:06
To: Field, Jane
Cc: ForwardPlanning
Subject: Stafford Borough - Examination Initial Questions

Dear Jane

I hope you are well.

As you may be aware the Plan for Stafford Borough was submitted for Examination on Tuesday 20 August 2013.

I would appreciate it if you could confirm that the Environment Agency are satisfied that there are no outstanding issues in relation to the Strategic Flood Risk Assessment and water management, and that the approach has been agreed.

Based on the attached Duty to Co-operate pro-forma and the second to last line of your message received on 11 July 2013 I consider that there are no outstanding issues or concerns but the Inspector has asked us to confirm through his initial question set out below.

In the context of the contextual text and the question set out below, please could you provide a response from the Environment Agency regarding whether the approach for the Strategic Flood Risk Assessment and water management have been satisfactorily met.

Strategic Flood Risk Assessment

The Inspector notes the documents relating to flood risk and water management (Documents D40-D50). ***Can the Council confirm whether there are any outstanding issues relating to the Strategic Flood Risk Assessment and water management, and that the approach has been agreed with the Environment Agency?***

Access to the Examination library can be obtained through the following web-links:
www.staffordbc.gov.uk/examination

<http://www.staffordbc.gov.uk/examination-library>

I look forward to hearing from you in the very near future.

Kind regards

Alex

APPENDIX 7 – RESPONSES FROM STAFFORDSHIRE COUNTY COUNCIL AS THE HIGHWAYS AUTHORITY AND THE HIGHWAYS AGENCY REGARDING TRANSPORT INFRASTRUCTURE

HIGHWAYS AGENCY RESPONSE

From: Alex Yendole
Sent: 02 September 2013 09:17
To: 'Pinnock, Samantha'; Melissa Kurihara; Alex Yendole
Cc: Maric, Lisa; Dawson, Nick (Place)
Subject: RE: Stafford Borough - Initial Examination Questions

Dear Samantha

Many thanks for the message.

Kind regards

Alex

From: Pinnock, Samantha [<mailto:Samantha.Pinnock@highways.gsi.gov.uk>]
Sent: 29 August 2013 14:35
To: Melissa Kurihara; Alex Yendole
Cc: Maric, Lisa; Dawson, Nick (Place)
Subject: FW: Stafford Borough - Initial Examination Questions

Dear Alex, Melissa

The Agency can confirm that there are no outstanding issues relating to transport infrastructure, and we have no issues which would raise concerns regarding the Plan's strategy.

Kind Regards

Samantha

From: Melissa Kurihara [<mailto:mkurihara@staffordbc.gov.uk>]
Sent: 29 August 2013 09:20
To: Pinnock, Samantha
Subject: RE: Stafford Borough - Initial Examination Questions

Hi Sam,

I was wondering if you have had chance to consider a response from the HA regarding Alex's email below?

Please get in touch if you would like to discuss any aspect of this.

Kind regards,

Melissa

Melissa Kurihara MRTPI
Senior Planning Officer
Stafford Borough Council
Tel: 01785 619533
Email: mkurihara@staffordbc.gov.uk

From: Alex Yendole
Sent: 22 August 2013 10:27
To: Pinnock, Samantha (Samantha.Pinnock@highways.gsi.gov.uk)
Subject: Stafford Borough - Initial Examination Questions

Dear Sam

I hope you are well.

As you may be aware the Plan for Stafford Borough was submitted for Examination on Tuesday 20 August 2013.

I would appreciate it if you could confirm that the Highways Agency are satisfied that there are no outstanding issues in relation to transport infrastructure and that the Highways Agency does not have any concerns about the Local Plan strategy which would raise concerns regarding the soundness of the Local Plan. I consider that there are no outstanding issues or concerns but the Inspector has asked us to confirm through his initial question set out below.

In the context of the text and the question set out below, please could you provide a response from the Highways Agency regarding whether you have any concerns about the Plan's strategy and whether there are any outstanding issues related to transport infrastructure.

Transportation

The Inspector notes the documents relating to transportation (Documents D18-D27/E28-E49). ***Can the Council confirm whether there are any outstanding issues related to transport infrastructure, and whether the Highways Agency and Highways Authority have any concerns about the plan's strategy?***

Access to the Examination library can be obtained through the following web-links:
www.staffordbc.gov.uk/examination

<http://www.staffordbc.gov.uk/examination-library>

I look forward to hearing from you in the very near future.

Kind regards

Alex

STAFFORDSHIRE COUNTY COUNCIL – HIGHWAYS AUTHORITY RESPONSE

From: Alex Yendole
Sent: 02 September 2013 09:38
To: 'Parkinson, Mark (Place)'; ForwardPlanning
Cc: Dawson, Nick (Place); Chadwick, James (Place)
Subject: RE: Stafford Borough - Examination Initial Questions

Dear Mark

Many thanks for the message.

Kind regards

Alex

From: Parkinson, Mark (Place) [<mailto:mark.parkinson@staffordshire.gov.uk>]
Sent: 23 August 2013 09:56
To: ForwardPlanning
Cc: Dawson, Nick (Place); Alex Yendole; Chadwick, James (Place)
Subject: RE: Stafford Borough - Examination Initial Questions

Dear Sirs

With regard to the email dated 22 August 2013 from Alex Yendole to Nick Dawson at Staffordshire County Council, in respect of:

Transportation

The Inspector notes the documents relating to transportation (Documents D18-D27/E28-E49). ***Can the Council confirm whether there are any outstanding issues related to transport infrastructure, and whether the Highways Agency and Highways Authority have any concerns about the plan's strategy?***

I have contacted Alex Yendole to discuss and he has advised that the Duty to Cooperate Proforma we signed 15 March 2013 was omitted from the Duty to Cooperate statement presented as part of the evidence base as Item B3. He indicated that he will arrange for the pro-forma to be added to the evidence base after being signed by their Cabinet Member and that I should advise the Forward Planning e-mail accordingly (as he will not be in the office after 4.00 p.m. yesterday until Monday 2 September 2013).

I trust this meets yours (the inspectors) requirements at this time, but please let me know if you are seeking anything a bit stronger or more formal such as a Memorandum of Understanding, etc?

Regards

Mark Parkinson
Economic Development and Planning Policy Manager
Staffordshire County Council
Economic Planning & Prosperity
Wedgwood Building, Block A
Tipping Street
Stafford
ST16 2DH

Tel: 01785 27 6807
Mobile: 07855 336 930
Email: mark.parkinson@staffordshire.gov.uk

From: Alex Yendole [<mailto:ayendole@staffordbc.gov.uk>]
Sent: 22 August 2013 10:27
To: Dawson, Nick (Place)
Subject: Stafford Borough - Examination Initial Questions

Dear Nick

I hope you are well.

As you may be aware the Plan for Stafford Borough was submitted for Examination on Tuesday 20 August 2013.

I would appreciate it if you could confirm that Staffordshire County Council, as the Highways Authority are satisfied that there are no outstanding issues in relation to transport infrastructure and that Staffordshire County Council does not have any concerns about the Local Plan strategy which would raise concerns regarding the soundness of the Local Plan. I consider that there are no outstanding issues or concerns but the Inspector has asked us to confirm through his initial question set out below.

In relation to the contextual text and the question set out below, please could you provide a response from Staffordshire County Council as Highways Authority regarding whether you have any concerns about the Plan's strategy and whether there are any outstanding issues related to transport infrastructure.

Transportation

The Inspector notes the documents relating to transportation (Documents D18-D27/E28-E49). ***Can the Council confirm whether there are any outstanding issues related to transport infrastructure, and whether the Highways Agency and Highways Authority have any concerns about the plan's strategy?***

Access to the Examination library can be obtained through the following web-links:
www.staffordbc.gov.uk/examination <http://www.staffordbc.gov.uk/examination-library>

I look forward to hearing from you in the very near future.

Kind regards

Alex

8/2/2013 Duty to Co-operate Protocol & Checklist

Local Planning Authorities and other bodies party to this understanding:
Staffordshire County Council (SCC) Stafford Borough Council (SBC)

Development Plan Document(s) covered by this understanding:
SBC - The Plan for Stafford Borough (Local Plan)

Stage in the process forming part of this understanding:
The Plan for Stafford Borough - Publication

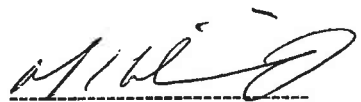
Checklist criteria NB: this is a starting point, list to be mutually agreed	Areas for discussion & co-operation NB: Refer to attachments if required
Overall strategy incl. relationship to urban and rural renaissance	SBC strategy to focus new development at Stafford, a lesser extent at Stone and Key Service Villages in rural areas. No Green Belt boundary changes.
Level of housing provision	SBC provision of 500 new homes per year, totalling 10,000 over the Plan period (2011-2031).
Distribution of housing provision	SBC housing distribution with a focus on Stafford (7,200 houses) with 800 houses at Stone, post 2021, and development in rural areas for 2,000 new homes. SCC is working with SBC and stakeholders to plan for the delivery of relevant infrastructure provision, in particularly, transport & connectivity and education.
Level and distribution of employment land provision	SBC employment provision of 8 hectares per year totalling 160 hectares over the Plan period. Stafford main focus 90 hectares majority with permission, 20 hectares at Stone through new site post 2021 and 50 hectares in rural areas including 34 hectares at Meaford and 12 hectares at new sites.
Level and distribution of retail provision	SBC does not have proposals for significant retail development outside main centres at Stafford (38,000 sq metres) and to a lesser extent at Stone (3,600 sq metres). No cross border implications for retail.
Level and distribution of office provision	SBC does not have proposals for significant office developments outside main centre at Stafford. Total provision is 45,000 sq metres.

Appropriate provision made for public and private transport incl P&R and commuting patterns	SBC strategy in accordance with Staffordshire County Council's Local Transport Plan and the District Integrated Transport Strategy. Transport infrastructure focused on Stafford with new developments to reduce commuting patterns. No significant cross border commuting issues.
Consistency of planning policy and proposals across common boundaries	Support for new Green Infrastructure provision including open space, sport & recreation facilities. Neither party has significant concerns regarding Plans.
Any Other Strategic Duty to Co-operate Matters	<p>Cannock Chase Special Area of Conservation delivery of evidence base and mitigation plan for Suitable Alternative Natural Greenspace alongside new developments.</p> <p>No site identified for Regional Logistics Site, subject to future evidence based studies.</p> <p>Further details concerning a range of infrastructure requirements and delivery measures set out in the Stafford Borough Infrastructure Delivery Plan (July 2012).</p>

Log of meetings, reports and other records to substantiate the collaborative working:

<p>Letters from:</p> <p>Alex Yendole (SBC – Planning Policy Manager)</p> <p>See note.</p> <p>Staffordshire County Council records relating to infrastructure planning are contained in the corporate content management system: TRIM:</p>	<p>24 August 2012 & 8 February 2013</p> <p>CMS Search Fields: Title word: e.g. Western Access Coverage. spatial: Stafford SCC Identifier: Local Plan Date: Various – ongoing (15 year plan)</p>
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We, the undersigned, agree that the above statements and information truly represent the joint working that has taken place under the 'Duty to Co-operate'.



Authority A*



Authority/ Organisation B (& C, D etc)*

* Must be signed by either Board Chairman or responsible Chief Officer only. For non-local authority organisations signatory should be at equivalent level.