



**The Plan for Stafford Borough –
Publication**

**Examination Statement –
Economy**

October 2013

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ECONOMY

1. KEY ISSUE:

Does the Plan set out a clear economic strategy which positively and proactively encourages sustainable economic growth, and are the policies for the local and rural economy, tourism and canals, town, local and other centres soundly based, effective and appropriate for Stafford Borough, supported by a robust, credible and up-to-date evidence base and consistent with national policy?

- 1.1. The Borough Council considers The Plan for Stafford Borough- Publication (Submission) Document (A1), hereafter "the Plan (A1)", to be sound and consistent with national guidance, in particular with National Planning Policy Framework (NPPF) (F1) para. 21. The Plan (A1) sets out a clear economic strategy, which is informed by a robust, credible and up-to-date evidence base, including a series of Employment Land Reviews (D14 and E21 – E26), which assess the scale of new employment growth required through current trends compared to labour demand. This has helped identify a portfolio of deliverable, suitable sites for future employment land supply across Stafford Borough.
- 1.2. Throughout the plan-making stages the distribution of locations for new employment development, was tested through the Sustainability Appraisal process documented in the Sustainability Appraisal Commentary Volume 2 (H7) and subsequently in the Sustainability Appraisal Report (H4), and recorded in the Revised Sustainability Appraisal Report (A10). This economic strategy has also been informed by a series of public consultation exercises detailed in the Plan for Stafford Borough Submission Consultation Statement (A14). The Duty to Co-Operate Statement (B3) explains how a partnership approach has been developed amongst neighbouring authorities to deliver balanced housing and employment land across Staffordshire. Through the Stoke-on-Trent and Staffordshire Local Enterprise Partnership (LEP) an Economic Growth Strategy (E17) has been developed, showing how the Plan's Strategic Development Locations (SDLs) and existing employment sites earmarked for Stafford and Stone will help contribute towards making Staffordshire competitive for business in the UK. The Economic Growth Strategy was produced after the development of the Plan (A1), but recognises the Local Plan as a means to achieve the strategy's economic vision. The Economic Growth Strategy recognises the Local Plan process, and stresses the importance of a range of strategic employment sites in high profile locations including SDLs that will help create jobs across the county. The Plan's (A1) Economic Policies will thus help support the priorities set out in the Economic Growth Strategy.
- 1.3. The Plan (A1) provides a sustainable framework for delivering economic growth that is considered appropriate for the future of Stafford Borough. It sets an overarching Vision (page 17) to promote economic growth and sustainable development. The central tenets of the vision are then articulated through key objectives (page 19) and the Development Strategy, articulated by the Spatial Principles, which collectively provide

support for the local economy and for new employment development. The Plan identifies specific locations for development in the form of SDLs earmarked for Stafford (Policies Stafford 1, 2, 3 and 4) and Stone (Policies Stone 1 and 2), and support is given to the expansion and regeneration of existing employment sites (including Recognised Industrial Estates).

- 1.4. The economic strategy positively and proactively encourages sustainable economic growth by strengthening the role of Stafford and Stone Town Centres, set out in Policies Stafford 1 and Stone Policies Stone 1 (page 37 and 62). These policies seek to support all types of businesses by encouraging new services, up-skilling the traditional workforce and promoting a more balanced sustainable economy.
- 1.5. Spatial Principles (SP) SP2, (page 23), SP3 (page 26), SP5 (page 31) and SP6 (page 32) help deliver the Spatial Vision and Key Objectives of the Plan (A1). The provision of new employment proposed in the Plan (A1) aims to complement rather than duplicate the existing stock of sites by creating a portfolio of diverse land that is responsive to economic market requirements as they arise. The Plan (A1) Policies E1- E8, in line with NPPF (F1) para. 17 proactively drives and supports the economic development that is required for Stafford Borough. These policies will help guide future planning applications to facilitate the delivery of the Plan (A1).
- 1.6. Much of the employment land within Stafford Borough is currently already developed and in active use. The principal focus of Policies E1- E8 within The Plan (A1) is to regenerate existing estates and provide new employment land within the most sustainable locations.
- 1.7. To ensure that the rural areas of Stafford Borough flourish, Policy E1 recognizes the important contribution that the rural economy makes to providing sustainable employment opportunities for local people in rural areas. To provide a prosperous economy outside Stafford and Stone Towns Policies E3 (page 77) and E4 (page 78) support development of new employment and growth opportunities on land at existing Recognised Industrial Estates, whilst Policy E5 (page 79) provides for redevelopment of existing Major Developed Sites within the Green Belt for employment uses.
- 1.8. In addition, Policies E3 (page 77), E4 (page 78) and E5 (page 79) provides for development and redevelopment, and expansion (in the case of policies E3 & E4), of existing rural sites to provide employment for local communities.
- 1.9. The Plan (A1) sets out in Spatial Principle SP2 the new employment land requirement of 160 hectares to be delivered over the plan period. Spatial Principle SP5 directs that the majority of this should be focused on the main settlements of Stafford and Stone, but that provision should also be made for new employment provision in rural areas. Spatial Principle SP3 defines the Sustainable Settlement Hierarchy, which takes into account the level of infrastructure, services and facilities currently available, and

those areas with the most scope for future provision as well as accessibility to existing and future facilities.

- 1.10. Spatial Principle SP5 (page 31) shows a broad distribution of employment where a significant amount of employment is proposed in Stafford, being the largest settlement in the Borough. Stafford Town will accommodate 56% of new employment land development with new allocations to the North and East of Stafford. Stone will accommodate 12% of new employment land development proposed at Stone Business Park. The rural areas are to provide 32% of new employment land development, in order to provide sustainable, balanced, vibrant and self-reliant places in which to live and work. New allocations are proposed at existing industrial sites, in particular Ladfordfields and Raleigh Hall Industrial Estates. The Examination Statement concerning the Development Strategy provides more information on the Spatial Principles.
- 1.11. The Plan (A1) delivers an effective economic strategy for Stafford Borough. This strategy will help facilitate economic growth in Stafford Borough, support the aspirations of growth in the Borough, and in particular of Stafford town, help reinforce the role of Town Centres, and attract inward investment to provide for the Borough's communities.
- 1.12. The economic strategy, and the distribution of growth and change around the Borough, is considered in more detail in Background Statement (K1) Topic Papers A and D. These Papers explain that key factors in determining how much economic growth is appropriate are population and housing needs. This scale and distribution of employment growth between Stafford, Stone and other areas has been informed through the preparation of the plan process since 2009 and the process of public consultation and engagement through Delivering the Plan for Stafford Borough – Issues & Options (G6), the Plan for Stafford Borough – Draft Publication (G2) and the Plan for Stafford Borough – Strategic Policy Choices (G1). This process has been supported by the evidence base through the Assessment of Facilities and Services Stafford (E68) and Stone (E69), and the Revised Settlement Assessment of Services and Facilities (D54).
- 1.13. Policies E1-E8 shows 46 representations were received to this section of the Plan (A1). Representations show general support of Policies E1-E3 for meeting essential local development needs and the use of brownfield land, with waste management uses to be encouraged. Concerns were raised in relation to Policy E4 where impacts derived from new development could affect Eccleshall. However, while site promoters supported Policy E4 and Policy E5, others feel Policy E5 should be deleted as it was considered to conflict with the NPPF. Policy E6 was supported with suggestions to introduce a specific policy for Trentham Estate. A mix of representations shows support and objection to Policy E7, concerning canals and marinas. Objections were received in relation to Policy E8 relating to the restriction of new retail warehouses and superstores in edge of centre or out of centre locations. These concerns are addressed subsequently throughout this Statement.

2. LOCAL ECONOMY (Policy E1)

How will the proposed measures to sustain the local economy effectively support the location, diversity and intensity of new economic development and support sustainable economic growth within Stafford Borough, in line with national planning policy?

- 2.1. The Borough Council recognises a decline in traditional manufacturing services which has led to severe job losses. The Borough Council also recognises Stafford has high public sector employment in comparison to other districts. One of the key aspirations of the Plan is to facilitate growth away from public sector services and focus on the delivery of new, high technology areas such as creative computing, while developing and nurturing an existing skills base.
- 2.2. In accordance with the NPPF (F1) para. 21, Policy E1 (page 74) will help facilitate this transformation by promoting and encouraging new business start-up enterprises, incubator units and information technology capacity sectors in rural and urban areas of Stafford Borough. Policy E1 aims to increase the levels of skills and education attainment of the Borough's workforce. This links to the Stoke-on-Trent and Staffordshire Local Enterprise Partnership (LEP) Economic Growth Strategy (E17), which includes the LEPs aim to 'provide a quality educational offer' to ensure young people meet the needs of current and future employers, and adults are up-skilled and re-skilled. The delivery of enhanced education facilities and learning establishments will help support these programmes. An up-skilled workforce, increased levels of education attainment with the provision of high quality technological employment land and existing Recognised Industrial Estates will encourage inward investment and promote Stafford as a place to do business. This in turn will improve the quality and range of employment opportunities available.
- 2.3. In the delivery of Policy E1 the Borough Council will provide and safeguard employment sites, including existing sites to ensure they are adequate, modern, accessible, provide a variety of employment uses and are responsive to current and future economic changes for both small and large businesses. The provision of improved broadband services, public transport services and highway infrastructure in urban and rural employment areas will further support the sustainable location of employment.
- 2.4. In Policy E1 representations show support for the local economy, protecting agricultural land for food production and development at Recognised Industrial Estates.

Does the policy provide an appropriate balance between economic development in the urban and rural areas and between brownfield and greenfield sites?

- 2.5. Policy E1 (page 74) aims to deliver an appropriate balance of economic development in urban and rural areas. This is in accordance with NPPF (F1) para. 21, which supports the expansion and conversion of existing employment sites (both small and large) for new or emerging employment uses, which are located in both rural and urban areas, in

order to provide an increased and adequate supply of employment land. Furthermore, representations show support for Policy E1 because it aims to improve access to urban and rural employment areas through public transport services and infrastructure improvements while supporting agricultural diversification.

- 2.6. Though a significant amount of new employment is earmarked for Stafford and Stone Town, Policy E1 encourages farm and rural diversification for employment uses or service generating services, including live/work units to promote sustainable rural communities through the re-use of existing buildings. This is in line with Spatial Principle SP6 (page 32), which seeks to achieve rural sustainability by protecting and enhancing environmental assets whilst sustaining the social-economic fabric of rural communities. It is also related to Spatial Principle SP7 (page 33), which directs the establishment of settlement boundaries to secure the sustainable development around each settlement in the hierarchy, and also encourages development on brownfield sites to reduce the need for greenfield sites. This is by maximising the use of brownfield redevelopment sites.
- 2.7. A representation objected to the restriction of using brownfield land at settlements rather than across the Borough area generally. The Borough Council considers that the approach of Policy E1 (and the Spatial Principles) secures the best balance possible between brownfield and greenfield land. Much of the new employment provision will generally be extensions of current employment areas, and since it relates to existing premises, often on greenfield sites. This is further considered in relation to Policy E2.

3. SUSTAINABLE RURAL DEVELOPMENT, INCLUDING DEVELOPMENT WITHIN RECOGNISED INDUSTRIAL ESTATES AND MAJOR DEVELOPED SITES IN THE GREEN BELT (Policies E2-E5)

Policy E2:

How will the proposed measures effectively support the sustainability and economic growth of rural areas, in line with national planning policy?

- 3.1. Policy E2 (page 75) supports the development of new economic development that will enhance employment opportunities and support new businesses investment, particularly new start-up businesses and rural diversification schemes in rural areas. In accordance with the NPPF (F1) para 28, Policy E2 encourages sustainable economic growth by encouraging development on existing employment sites such as Recognised Industrial Estates (RIEs). Policy E2 lists a range of uses and proposals that are encouraged including provision for infrastructure that will help support a sustainable rural economy.
- 3.2. The measures in this Policy support economic development in rural areas on existing brownfield sites before proposing the use of greenfield land (E2 criterion a). The Policy encourages proposals to make use of existing buildings without significantly making alterations, or expansions that could potentially affect protected species or habitats in rural areas. This is

achieved by granting development so long as it provides for appropriate economic uses without threatening existing viable uses; for sustainable use or re-use of rural buildings; is well related to existing settlements; appropriately designed for its purposes; and accessible by public transport. The measures outlined in this Policy ensure development will complement existing uses and landscape. This is in accordance with NPPF para.28.

- 3.3. This Policy will also encourage the provision of infrastructure necessary to support businesses in rural areas, and the diversification of the agricultural economy to new land uses such as rural tourism and leisure, and renewable energy generation, whilst equally seeking to protect and conserve the local historic environment and landscape.

Are the criteria for development in rural areas, including re-use of rural buildings, appropriate, effective, justified, soundly based and consistent with national policy?

- 3.4. Policy E2 is consistent with national guidance in the NPPF. It is soundly based, being informed by a robust, credible and proportionate evidence base. This includes a series of Employment Land Reviews (D14 and E21 – E26). The Policy provides specific guidance and defines the approach necessary in rural areas to help achieve rural sustainability.
- 3.5. The criteria set out in Policy E2 are appropriate and in accordance with NPPF (F1) para 28. The Policy helps support the growth and expansion of new and existing developments by promoting the use of existing sites or buildings. Its criteria seek to ensure new development complements' existing uses and ensure proposals respect the landscape character through achieving high quality design which is not detrimental to the area. The criteria are feasible and will help to achieve sustainable development.
- 3.6. A robust and credible evidence base has determined the level of development that can be sustained in rural areas. The Policy criteria actively encourage the re-use of buildings, whilst preventing and or limiting the impact on amenity and landscape. This ensures development will complement and not threaten viable agricultural operations within rural areas, while protecting the natural landscape, the built vernacular character and designated and undesignated heritage areas.
- 3.7. The criteria set out in this Policy are considered to be appropriate because they help deliver a diverse and regenerated rural economy, as set out in the Spatial Vision and Key Objectives (page 17) of the Plan (A1). Some of these objectives include the delivery of new employment opportunities through existing industrial areas and the delivery of sensitive additional facilities required to improve local services in rural areas to maintain sustainability. Policy E2 is also consistent with and helps the delivery of Spatial Principle 6 (page 32). This Spatial Principle supports the sustainable growth of rural businesses through the diversification of farm based enterprises, and the redevelopment, intensification and/or expansion of existing rural businesses. This will

enable local people living in rural areas to reduce commuting and provide local and greater access to jobs.

- 3.8. Policy E2 is supported by representations that were received in relation to Recognised Industrial Estates for meeting essential local development needs and the use of brownfield land to protect the landscape. This is recorded in the Submission Consultation Statement (A14). However, there were concerns expressed that local need, if used to restrict housing development, was contrary to the NPPF. These are matters which are addressed in other Statements, concerning the housing strategy.

Does the policy provide an appropriate balance between brownfield and greenfield development and between economic and residential uses?

- 3.9. The Borough Council considers that the approach of Policy E2 (and the Spatial Principles) secures the best balance possible between brownfield and greenfield land. Though much of the new employment provision will generally be extensions of current employment areas and often inevitably on greenfield sites, there is a significant amount of brownfield sites located in the North Staffordshire Green Belt known as Major Developed Sites. These sites are identified in the Plan's Policies Map (A2) and Inset Maps (A7, A8 and A9) to encourage re-development for new employment provision.
- 3.10. Given the scale of development required at Stafford Borough over the plan period, it will be necessary to allocate greenfield land in sustainable locations as there is insufficient brownfield land in sustainable locations to meet requirements. This will be supported through the Sustainable Settlement Hierarchy (SP7). Also, consistent with the objective of reducing the need for greenfield developments in the plan area and adjacent areas over the plan period, Policy Stone 2 (West and South of Stone) requires that development will not take place until after 2021, in order to provide opportunity to deliver brownfield land development within the North Staffordshire area.
- 3.11. During the plan period, in order to maintain an appropriate balance between brownfield and greenfield development, Policy E2 actively promotes and encourages economic development in rural areas on existing brownfield sites before proposing the use of greenfield land. It also gives priority to economic uses before residential uses so long as development provides for a sustainable use or re-use of rural buildings. The policy overall encourages development that will support and complement an existing settlement. It seeks to avoid development on greenfield sites while making use of existing buildings without significantly making alterations, or expansions that could potentially affect protected species or habitats on greenfield land.
- 3.12. Representations show support for employment in rural areas but people are generally concerned about the loss of open space. This policy will help protect the loss of open space and agricultural land by seeking to divert development onto existing brownfield sites. The Borough Council considers that the Plan for Stafford Borough – Publication (A1) is sound

but accepts that Policy E1 should make reference to the best and most versatile agricultural land, to comply with NPPF (F1) para 112. Therefore the Schedule of Additional (Minor) Modifications (A26) identifies a proposed change, listed as M59.

Policies E3 & E4:

Is the approach to economic development and the range of uses at the designated industrial estates within the rural area appropriate, effective, justified, soundly based and consistent with national policy?

- 3.13. The Borough Council considers Policy E3 (page77) and Policy E4 (page 78) to be soundly based as they have been informed by a robust and proportionate evidence base. These Policies conform to NPPF (F1) para 22, which indicate that long term protection of sites allocated for employment use should be avoided where there is no reasonable prospect of a site being used for that purpose and instead ensure a range of alternative uses are permitted that support sustainable local communities. The RIEs contain active uses that meet local need and promote the rural economy, such as light industrial developments, limited ancillary retail, offices, storage and distribution and other employment generating uses that will meet local demand.
- 3.14. Policies E3 and E4 are positive and promotional, following a review of potential, in line with the NPPF's general support for sustainable economic development. In particular the Employment Land Review (D14) has helped establish potential sites including existing employment sites that can deliver economic uses. Certain of these existing sites are sites described in Policies E3 and E4, designated as Recognised Industrial Estates (RIEs).
- 3.15. In accordance to NPPF (F1) para 21, these policy approaches are considered justified and appropriate because they seek to protect and maintain designated sites of employment by encouraging a range of economic uses that are flexible and responsive to economic circumstances, while reducing impact on the environment. Policy E3 and E4 are effective as a means of increasing employment opportunities for the rural economy, supporting provision of jobs and services that meet local demand and enable existing firms to expand throughout the plan period. These Policies will help provide an appropriate balance between new and existing businesses without undermining the environment, and ultimately will help to sustain the local economy.
- 3.16. Policy E3 and Policy E4 proactively encourage sustainable development through the expansion of RIE's and help deliver the development strategy in the Plan (A1). The expansion of RIE's will help support the Sustainable Settlement Hierarchy outlined in Spatial Principle SP3, which encourages growth for the local economy in sustainable locations in the rural areas. Although RIEs are outside the Sustainable Settlement Hierarchy, they will still help to provide opportunities which will help support neighbouring settlements in the hierarchy. Raleigh Hall will provide jobs for local people in Eccleshall. This will also reduce rural to urban commuting. Other RIEs include Ladfordfields, Moorfields, Pasturefields, Hixon, and Hixon Airfield.

These help to economically serve the Key Service Villages of Gnosall, Yarnfield and Hixon.

- 3.17. Representations on Policy E3 show support for RIEs as a means to deliver sustainable economic development in rural areas. A concern was raised about excluding waste uses from employment sites due to lack of reference to sui generis uses. The Borough Council considers that the Plan (A1) is sound but accepts Policy E3 – a Light Industrial uses should include waste management uses. Therefore the Schedule of Additional (Minor) Modifications (A26) identifies a proposed change, listed as M62.
- 3.18. Representations were also received in reference to Policy E4, which relates to Raleigh Hall & Ladfordfields Recognised Industrial Estates, and identifies the scale, location and implementation of new employment development including detailed criteria to be addressed. The current landowners for these locations confirm the delivery of this development, as detailed in the Plan for Stafford Borough Publication – Representations Received (A18). Appendix D of the Plan (A1) provides details in terms of infrastructure requirements, phasing, capital costs and funding from employment developments at Raleigh Hall and Ladfordfields.
- 3.19. However, concerns were raised through Policy E4 that new development at Raleigh Hall RIE would be detrimental to Eccleshall, and raising issues of loss of open countryside, traffic congestion issues and poor access for Heavy Goods Vehicles, landscape implications and lack of suitable infrastructure with the actual new land area only being 4 hectares. As set out in Background Statement (K1) Topic Paper A, and the discussion concerning Spatial Principle 5 earlier in this Examination Statement, the provision of new employment opportunities outside of Stafford and Stone is important to sustaining the rural economy over the Plan period, and is supported by NPPF para 28. Therefore the Borough Council considers that new development at these existing employment locations in the rural areas is appropriate, and the issues raised can be satisfactorily addressed.
- 3.20. Two of the representations suggesting additional minor modifications to Policy E4. Stan Robinson (Stafford) Limited called for clarification in terms of minimising impacts on surrounding areas, traffic implications and connectivity of the proposed employment allocation and safeguarding the mains water supply. This was also the subject of the representation from Severn Trent Water. The Borough Council considers that the Plan (A1) is sound but would benefit from such clarification. Therefore the Schedule of Additional (Minor) Modifications (A26) identifies three proposed changes, listed as M63.

Is the proposal to deliver 6ha of new employment land at Ladfordfields Industrial Estate appropriate, effective, justified and soundly based, including flooding and surface water, nature conservation, landscape, utilities and accessibility issues and the need for local infrastructure improvements?

- 3.21. Ladfordfields is a Recognised Industrial Estate identified on the Policies Map (A2) and identified on the Plan for Stafford Borough Ladfordfields Recognised Industrial Estate Inset Map 1 (A5). The proposal at

Ladfordfields is justified and soundly based, reflecting the evidence base has informed this policy approach. In particular, the Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (D57) demonstrates that new employment development is deliverable and viable alongside the implementation of strategic infrastructure requirements. These have been confirmed by representations received from the site owners and promoters of these areas, including Ladfordfields as described in the Plan for Stafford Borough – Submission Consultation Statement (A14) and the Plan for Stafford Borough – Consultation Statement Appendices (A15).

- 3.22. Consideration has been given to Ladfordfields because proposals have been advanced and more opportunity has been taken to understand the needs of existing employers, in order to sustain a local economy without undermining the character of the environment. Consultation with local business interests has helped to derive appropriate criteria to help achieve sustainable economic development.
- 3.23. Whilst Policy E3 provides guidance on a range of economic uses that will be permitted at Ladfordfields, Policy E4 provides a list of requirements and guidance to support economic activity while reducing impact on local residents and the surrounding landscape and improving infrastructure development. This approach is effective and justified. In accordance with NPPF (F1) para. 21, Policy E4 seeks to address potential barriers to investment by encouraging proposals to put measures in place to address concerns such as accessibility through walking and cycling, or flooding through waste water infrastructure investment. An access, transport and travel plan strategy is also required to identify access points to the site and between existing settlements including construction access, and improvements needed to transport capacity to avoid disruption to existing residents.
- 3.24. Furthermore, Policy E4 seeks to address development needs to help achieve development and improve local infrastructure such as appropriate landscaping, provision of a local electricity sub-station, local highway improvements and gas re-enforcement works.
- 3.25. This Policy approach is considered to be appropriate as it helps achieve the Spatial Vision and Key Objectives of the Plan (A1). The expansion of Ladfordfields, an existing employment site, will help deliver the employment requirements of the Development Strategy set out in Spatial Principles SP3 and SP5 to meet the needs of existing employers, support economic development and employment in rural areas without undermining the character of the countryside.

Is the proposal to deliver 6ha of new employment land at Raleigh Hall Industrial Estate appropriate, effective, justified and soundly based, including flooding and surface water, nature conservation, landscape, utilities and accessibility issues, the need for local infrastructure improvements and the impact on the local community?

- 3.26. Raleigh Hall Industrial Estate is identified on the Policies Map (A2) and on Raleigh Hall Recognised Industrial Estate Inset Map 2 (A6). The Borough

Council considers the proposal at Raleigh Hall is justified, appropriate, and soundly based, reflecting the evidence base that is described above which has informed this policy approach.

- 3.27. The expansion of Raleigh Hall, an existing employment site, will help deliver the employment requirements of the Development Strategy set out in Spatial Principles SP3 and SP5 to meet the needs of existing employers, support economic development and employment in rural areas without undermining the character of the countryside. As a designated Recognised Industrial Estate (RIE), it will encourage new economic and inward investment in Stafford Borough. New employment opportunities that will derive from the expansion of this site will have a positive impact on the nearby settlements including Eccleshall and Gnosall while supporting new housing and infrastructure developments.
- 3.28. Policy E4 provides a list of requirements and guidance to support economic activity while reducing impact on local residents and the surrounding landscape and improving infrastructure development. This approach is effective and justified. In compliance with NPPF (F1) para 21, Policy E4 encourages proposals to put measures in place to address concerns which could have a negative impact on the environment.
- 3.29. Although Raleigh Hall and Ladfordfields have good transport links to Stafford Borough, the City of Stoke on Trent and the M6, Policy E4 requires proposals to improve accessibility through developing a local walking and cycling network. Other measures involve addressing flooding issues with waste water infrastructure investment and Sustainable Drainage Systems (SUDS). An access, transport and travel plan strategy is also required to identify access points to the site and between existing settlements including construction access to avoid disruption to existing residents. These measures are positive and aim to reduce the impact of new employment land on the local community and surrounding area.

Policy E5:

Is the approach to Major Developed Sites in the Green Belt, including Hadleigh Park, Moorfields Industrial Estate and former Meaford Power Station, appropriate, justified, effective, soundly based and consistent with national policy?

- 3.30. The Borough Council considers this approach to be appropriate, justified, effective, soundly based and consistent with national policy.
- 3.31. The existing Green Belt boundaries in Stafford Borough will be maintained and the Green Belt protected from inappropriate development as defined in the NPPF (F1). In accordance with NPPF para 83, Green Belt boundaries should be established to set a framework for Green Belt and settlement policy. Hadleigh Park, Moorfields Industrial Estate and the Former Meaford Power Station are three significant brownfield sites, shown as Major Developed Sites in the Green Belt on Policies Map (A2), and on individual Policies Inset Maps (A7, A8 and A9).

- 3.32. The NPPF encourages the expansion of existing employment sites in the Green Belt where limited infilling or partial or complete redevelopment will be for employment purposes.
- 3.33. The sites identified above are significantly large employment sites and existing employment sites located on brownfield land in Green Belt, and are well located within the existing transport network. By recognising these sites as Major Developed Sites within the Green Belt, Policy E5 enables economic re-development to take place, and help promote inward investment and create job opportunities to serve the North Staffordshire Conurbation. The Duty to Co-operate Statement - Update (K2) includes a pro-forma between Stafford Borough Council and the neighbouring authorities; the City of Stoke on Trent Council and Newcastle under Lyme Borough Council, which supports the approach for employment and the Green Belt.
- 3.34. This Policy approach is consistent with the purposes of the Green Belt indicated by NPPF para 84, and with the Plan's approach for development outside settlement boundaries as set out in Spatial Principle SP7.
- 3.35. A series of Employment Land Reviews (D14, E21 and E26) have identified these sites as deliverable and suitable sites to help deliver the future supply of employment land. Throughout the plan-making stages the distribution of employment locations for new development was established and tested through the Sustainability Appraisal process within the Sustainability Appraisal Commentary Volume 2 (H7) and subsequently through the Sustainability Appraisal Report (H4) and recorded in the Revised Sustainability Appraisal Report (A10).
- 3.36. This approach was informed by extensive public consultation exercises carried out during plan preparation, documented in the Plan for Stafford Borough Consultation Statement (A14). Representations show support for new energy infrastructure proposed at Meaford Power Station. However some representations consider that Policy E5 conflicts with the NPPF by encouraging employment development in Green Belt locations. The Council considers however that the Policy meets sustainable development objectives, and is consistent with the NPPF para. 21 and 89, which identifies exceptional circumstances for development in Green Belt.

Is the policy for the Green Belt, including existing settlements and the approach to identifying Safeguarded Land, appropriate, justified, effective, soundly based and consistent with national policy?

- 3.37. The Borough Council considers the Plan's approach to the control of development in the Green Belt, set out in A1 paras. 9.20 – 9.25, is effective, justified, appropriate, soundly based and consistent with the NPPF. The approach is essentially to rely upon national planning guidance, as set out in the NPPF. There is no need, and it would be inappropriate, to include specific control policies when the NPPF is clear and comprehensive.

- 3.38. A review of the Green Belt boundary is unnecessary. There is sufficient land identified to accommodate development needs over and beyond the plan period. It follows also that there is no need to identify safeguarded land through the new Plan as there is sufficient scope of land to serve the development needs of Stafford Borough beyond the Plan period. This policy approach is therefore considered appropriate for the Plan (A1).
- 3.39. Policy E5 enables infill development on previously developed sites within the Green Belt. This is in accordance with NPPF para. 89 and supports limited infill development or redevelopment within the Green Belt, which would not have a greater impact on the openness of the Green Belt. This policy identifies previously developed sites to achieve NPPF objectives for achieving sustainable development in Green Belt. The development strategy (SP7) helps support the location of new development in Green Belt.
- 3.40. Policy E5 is justified by a series of Employment Land Reviews (D14, E21 and (E26) which has identified a portfolio of deliverable, suitable sites across Stafford Borough. Throughout the plan-making stages the distribution of employment locations for new development, was established and tested through the Sustainability Appraisal process within the Sustainability Appraisal Commentary Volume 2 (H7) and subsequently through the Sustainability Appraisal Report (H4) and recorded in the Revised Sustainability Appraisal Report (A10).

4. TOURISM (Policy E6)

How will Policy E6 effectively promote and enhance opportunities for tourism and new visitor accommodation that benefit the local economy and community in appropriate locations in an effective and sustainable way, consistent with national policy?

- 4.1. The Tourism Industry generates a substantial amount of revenue for the local economy in Stafford and helps maintain employment locally. In the Plan (A1) Policy E6 (page 80) aims to increase opportunities for tourism and provide new visitor accommodation in appropriate locations where proposals can demonstrate (through a business case) a sustainable long term use without damaging the environment. The Plan seeks to achieve this by promoting enjoyment of the rich and historic natural landscape; new and existing recreational activities; preservation of attractive features including the town centres of Stafford and Stone and their enhancement to encourage more visitors into Stafford. This will be assisted by Policy E2, which helps facilitate tourism to achieve rural sustainability.
- 4.2. Policy E6 is consistent with NPPF (F1) para. 28, which support tourism opportunities in rural areas to help sustain the local economy, providing proposals are sensitively designed and not harmful to the natural environment.
- 4.3. The provision of new facilities in appropriate locations will help encourage more visitors into Stafford. New facilities and visitor accommodation will create more jobs for the local economy, benefit local businesses, and enhance the tourist profile of Stafford Borough. This also conforms to NPPF (F1) para. 28, which supports the provision and expansion of tourist

facilities where required in appropriate locations. Furthermore, Policy E6 supports opportunities that will reduce the carbon footprint of the development and promote sustainable tourism.

Should the Plan include a site-specific policy to support restoration and regeneration with new development at Trentham Estate/Gardens?

- 4.4. A representation was received to Policy E6 which supported the approach but called for a site specific policy at Trentham Estate and Gardens to encourage restoration and regeneration through new development for the benefit of tourism and heritage assets.
- 4.5. By way of policy history the adopted Stafford Borough Local Plan 2001 (F14) included Policy RLT19 – Accommodating New Development at Trentham Garden Estate, which provided a set of criteria to guide development, including conservation of the natural and historic environment, enhancing leisure and recreation facilities, economic benefits, effects on the Green Belt and highway implications. Policy RLT20 also supported appropriate infill uses at Trentham Gardens Estate. At the time of preparing the adopted Stafford Borough Local Plan 2001 (F14) the Trentham Gardens Estate was not meeting its full recreational potential and was in need of regeneration. However since that time significant re-development of the Trentham Gardens Estate has successfully taken place leading to a significant leisure and recreation resource not just for the local area but regionally and nationally.
- 4.6. The Borough Council feel it is not necessary to include a site-specific policy to support new development at Trentham Estate. New development proposals can adequately be addressed by the economic and environmental policies in the Plan. In relation to tourism development, Policy E6 supports new development by promoting enjoyment of the rich and historic natural landscape; new and existing recreational activities; preservation of attractive features. Proposals for new development at Trentham Estate could also be assisted by Policy E2, which helps facilitate tourism to achieve rural sustainability. Both these policies conform to the NPPF (F1) and consider protecting development in Green Belt. In environmental terms, any development will need to satisfy Policies N8 and N9, which will ensure that the environment of Trentham Estate and Gardens will be protected, conserved and enhanced.
- 4.7. As is evident from the successful regeneration of the Trentham Estate and Gardens in recent years it is possible to deliver high quality new development at this Registered Park and Garden within the North Staffordshire Green Belt.

5. CANAL FACILITIES & NEW MARINAS (Policy E7)

Does Policy E7 provide an appropriate, effective, justified and soundly based framework for considering development proposals alongside canals?

- 5.1. The canals and marinas across Stafford and Stone attract many tourists into the Borough from across the country. The Borough Council recognises that the canal network is a significant asset for the local economy but also needs to be balanced with the high quality natural environment of the area through sensitive new development and restoration. This is particularly important as the canal network passes through the Market Town of Stone and the Key Service Villages of Gnosall and Great Haywood. These areas are included in the Sustainable Settlement Hierarchy identified by Spatial Principle SP3. Therefore the Council considers that Policy E7 provides an appropriate context to support proposals for new canal facilities and infrastructure, seeking to enhance the function and appearance of canals and their frontages within the Sustainable Settlement Hierarchy, whilst protecting and conserving the landscape and ensuring development does not conflict with users, pedestrians or impose risks to the existing road network.
- 5.2. Policy E7 of the Plan (A1) will be effective in supporting the delivery of new development proposals through a sensitive approach to the Stafford Borough area, with the focus on the settlement hierarchy in Spatial Principle 3 whilst ensuring that the natural environment is protected and enhanced through criteria which seek to sensitively reflect proposals of an appropriate scale elsewhere. Furthermore Policy E7 provides an approach which supports the delivery of the Spatial Vision and Key Objectives of the Plan (A1) through a key strategic network of accessible green space providing a clean, safe and enjoyable place to live and visit. Policy E7 seeks to strengthen the role and character of Stafford, Stone and the Key Services Villages by encouraging development which enhances the Canal and Marina network while attracting visitors and economic benefits.
- 5.3. The Council consider that Policy E7 is consistent with national policy through the NPPF (F1) para. 28 in supporting a prosperous rural economy through sustainable rural tourism and leisure developments, which benefit the local area and respect the character of the countryside.
- 5.4. Justification for Policy E7 has been established as part of the plan-making process, including public consultation and engagement, through the Plan for Stafford Borough – Draft Core Policies (G5) and the Plan for Stafford Borough – Draft Publication (G2) prior to being included in the Plan (A1). Details of public consultation and engagement responses are set out in the Plan for Stafford Borough - Submission Consultation Statement (A14) and the Plan for Stafford Borough – Consultation Statement Appendices (A15).
- 5.5. Therefore the Borough Council considers that Policy E7 is appropriate, effective, justified and soundly based as a framework for considering development proposals alongside the canal network within Stafford Borough.

Is the proposed restriction on permanent moorings in the countryside unduly restrictive?

- 5.6. A number of representations to Policy E7 called for restrictions on permanent moorings in the open countryside to be deleted, whilst other representations supported protecting the open countryside from intrusive active canal frontages.
- 5.7. As set out above the Council is seeking to support a prosperous rural economy, in line with the NPPF (F1) para. 28, by encouraging new development alongside canals at settlements within the settlement hierarchy, which ensures that access to services and facilities is maximised for those visitors and residents using the canal network. The Council considers that this is a robust approach for the Stafford Borough in the context of a presumption in favour of sustainable development defined through the NPPF (F1). Stafford Borough benefits from an extensive canal network across many miles including the Shropshire Union, the Trent & Mersey canal and the Staffordshire & Worcestershire canal through high quality environment and landscapes. Within this context it is important to ensure that the canal network and new developments associated with that network take account of all the relevant planning considerations, including tourism and environmental objectives, in securing development which is sustainable.
- 5.8. The Council is aware of affordability pressures in the housing market of the Borough, as evidenced through the Strategic Housing Market Assessment 2013 (D2). In recent years there has been increased interest, through planning applications, for permanent moorings on the canal network where people can live as well as new marinas for visitors to the area. The Council does not anticipate that this situation will change in the future and therefore considers that it is appropriate to ensure sustainable development focused on the settlement hierarchy is delivered through Policy E7. In order to protect the high quality environment across Stafford Borough and ensure that the extensive canal network does not lead to people living in less sustainable locations the Council considers that a restriction on permanent moorings in the countryside is not unduly restrictive and is appropriate and justified through the NPPF (F1) in the local circumstances.

6. TOWN, LOCAL AND OTHER CENTRES (Policy E8)

Does Policy E8 provide an appropriate, effective and soundly based framework for maintaining and enhancing the roles, functions, vitality and viability of Stafford Town Centre, Stone Town Centre, Eccleshall Local Centre and other Village and Neighbourhood Shops, which is justified with evidence (Retail and Town Centres Studies and Town Centre Capacity Assessments) and consistent with Policy Stafford 1, Policy Stone 1 and national policy?

- 6.1. Policy E8 of the Plan (A1) (page 82) provides a clear strategic framework to define and strengthen the role and enhance the vitality and viability of

Stafford and Stone Town Centres, and other significant retail centres across the Borough. The Boundaries of Stafford and Stone Town Centre including the primary shopping areas are defined in the Plan for Stafford Borough - Policies Map (A2) and the Stafford Inset Map (A3) and Stone Inset Map (A4).

- 6.2. Policy E8 is consistent with NPPF (F1) para. 23, which recognises town centres as the heart of their communities. It defines a network and hierarchy of centres for the Borough, comprising town and local centres, together with village and neighbourhood shops. Policy E8 defines the extent and primary uses of each town, local and other centres. Identifying these functions in Policy E8 helps promote competitive town centres and helps deliver a variety of customer choices with a diverse retail offer. In accordance with NPPF para. 23, this promotes the individuality of town, local and other centres.
- 6.3. The Borough Council consider this Policy soundly based and effective in the delivery of the Plan (A1). Whilst it provides a strategy for increasing vitality, and enhancing the role of town and local centre across Stafford, it also provides support to proposals and activities that help retain and enhance assets. Policy E8 supports development and extensions in existing villages and neighbourhood shops providing development meets local demand and does not impact on the hierarchy of centres and does not result in loss of amenity. This policy approach helps reinforce the dominant role of Stafford and Stone Town Centre as key retail centres, providing new retail floor space and new jobs while increasing the vitality in Stafford Borough.
- 6.4. The Borough Council consider this policy is appropriate as it helps achieve the Plan (A1) Spatial Vision and Key Objectives, which include enhancing the national and regional profile of Stafford Borough, and supporting its growing economy. Policy E8 will be delivered in conjunction with the Plan (A1) Policy Stafford 1 (page 37) and Policy Stone 1 (page 62).
- 6.5. Policy E8, together with Policies Stafford 1 and Stone 1, will help deliver high quality employment land in Stafford and Stone Town Centres, and help attract inward investment. Policy Stafford 1 (page 37) aims to regenerate the town centre through promoting diversity of uses in the town centre, as well as retailing, to support the role of Stafford town as the County Town. This Policy also promotes the development of the leisure and evening economy, and a growth in tourism and employment in the centre. This will help to ensure the local economy is resilient to changes in retailing (for example the growth of on-line shopping), building on the existing wide offer of Stafford Town Centre. Policy Stone 1 (Page 62) promotes economic diversification in Stone while strengthening its role as a Market Town which will be supported by the Sustainable Settlement Hierarchy (SP3 page 26). Policy Stone 1 encourages development and expansion of the town centre, increasing new office, commercial and retail space and enhancing primary shopping areas and leisure provision alongside recommendations for the town centre boundaries. Policy Stafford 1 and Policy Stone 1 will be consistent and complementary to Policy E8, in supporting the sustainable future of the town centres and delivering vitality.

- 6.6. Policy E8 is justified through a proportionate and credible evidence base including evidence used to inform Policy Stafford 1 and Policy Stone 1. The Stafford and Stone Town Centre Capacity Assessment – Final Report (D16) and its Appendices (D17) assess the current role and capacity of Stafford and Stone town centres based on existing shopping patterns as well as setting out the future needs for provision of new retail, commercial and office floor space to which should be met in the town centres. The Stafford and Stone Town Centre Retail Capacity – Update Final Report (D15) provides the most up-to-date position, published in May 2013. Policy E8 has undergone extensive public consultation throughout the development of the plan since 2009 including at the Issues and Options stage (G6) and the Plan for Stafford Borough Draft Publication (G2) stage, together with the Sustainability Appraisal process and its Reports (H7, H4 and A10).

Are the measures to increase the use of town centres effective, including the range of uses and the criteria for permitting non-retail uses?

- 6.7. The measures outlined in Policy E8 (page 82) will be effective, and are consistent with NPPF (F1) para. 23, since the approach is positive and will help create competitive town centres to encourage economic activity. The Policy aims to improve the retail sector to reinforce the role of Town Centres. It focuses on promoting a range of uses including entertainment and culture to increase the vitality of Stafford and Stone Centres, while providing more reasons for people to visit town and local centres generally, supporting provision of restaurants, cafes, and drinking establishments which are accessible, where they do not cause disruption to nearby properties or activities. The future use of town and local centres is informed by the evidence base listed above.

Is the approach to edge and out-of-centre uses, and to resisting the loss of existing facilities, unduly restrictive, effective, justified with evidence, soundly based and in line with national policy?

- 6.8. The Borough Council considers this approach to edge and out-of-centre uses and resisting loss of existing facilities not overly restrictive but effective, justified with evidence, soundly based and consistent, in line with the NPPF (F1).
- 6.9. A number of representations expressed concern about edge and out of centre locations for town centre uses being more stringent than the sequential approach in the NPPF (F1) paras. 24 – 26, with implications for vitality and viability. In addition the threshold position in the NPPF of 2,500 m² was commented upon.
- 6.10. Recognising that town centres are the heart of communities, Policy E8 restricts new retail warehouse development and superstores on the edge and out-of-centre uses in order to support the viability and vitality of the town centre at Stafford. This helps meet the retail needs and capacity identified in the Stafford and Stone Town Centre Capacity Assessment -

Final Report (D17). It also reinforces the function of key retail centres and helps support major economic growth in town centres themselves. This enables Policy E8 to be effective.

- 6.11. Policy E8 conforms to NPPF para. 26 which indicate that Local Planning Authorities should require an impact assessment for retail, leisure and office development outside of town centres. Where there is no locally defined threshold, the default will be 2,500 sq.m should be applied. However evidence within the Stafford and Stone Town Centre Capacity Assessment (D16) states that a blanket threshold across Stafford Borough is not appropriate as a 500 square metre scheme is likely to have a greater impact on a local centre than a similar facility would have on Stafford and Stone town centres. The Borough Council considers that the Plan (A1) is sound but would benefit from further clarification in terms of thresholds relating to impact assessments. Therefore the Council sets out in the Schedule of Further Additional Modifications (A27) an additional paragraph to Policy E8 to read "Development proposals at Stafford and Stone providing greater than 500 sq m gross floorspace for town centre uses in an edge or out-of-centre location should be the subject of an impact assessment. For local centres the threshold should be 300 sq m gross floorspace." as listed at FAM26. In addition para 9.31 of the Plan (A1) should be amended to refer to the local thresholds. Therefore the Council sets out in the Schedule of Further Additional Modifications (A27) the following text to be added to the end of the 3rd sentence of para 9.31 to read: "... of developments over the locally set thresholds." as listed at FAM27
- 6.12. This Policy has been justified through assessments which identify retail capacity needs, assess the current role and capacity of Stafford and Stone town centre based on existing shopping patterns as well as setting out the future needs for provision of new retail, to be met by Stafford and Stone town centre. The Stafford and Stone Town Centre Retail Capacity – Update Final Report (D15) provides the most up-to-date position on retail capacity and a future retail strategy, while the Employment Land Review (D14) helps identify new employment land and existing types of business sectors across Stafford Borough. This helps determine the range of services and facilities required in the town centres. The definition of the town centre and primary shopping area boundaries in Stafford and Stone (considered in the respective Examination Statements) have been drawn to provide scope for estimated future needs to be met within those boundaries, i.e. In-centre, obviating any significant need for edge of centre developments (and no need for out of centre developments to meet forecast retail expenditure), in accordance with the approach set out in NPPF paras. 23 and 24.
- 6.13. NPPF para. 23 states policies should be positive, promote competitive town centre environments. If needed, Local Planning Authorities should allocate appropriate edge of centres sites for main town centre uses that are well connected. This is the approach which has been taken in establishing and reviewing the boundaries. Notwithstanding the proposed boundaries, which take account of forecast needs, Policy E8 provides a robust and resilient approach to future development, consistent with the

NPPF, as it would support development of appropriate edge of centre sites for main town centres uses that are well connected to the town centre if suitable and viable town centres sites are not available.

- 6.14. The Plan (A1) aims to deliver centres that are vibrant, easily accessible, and sustainable and attracts a lot of people. In accordance with NPPF para. 23, Policy E8 aims to provide customer choice and a diverse retail offer which reflect the individuality of town centres by managing the type of uses in edge of centres and out-of-centres.
- 6.15. Resisting the loss of existing facilities is not overly restrictive. It conforms to the NPPF para. 23; local authorities should retain and enhance existing markets and, where appropriate, re-introduce or create new ones, ensuring that markets remain attractive and competitive. Policy E8 aims to support proposals and activities that protect, retain or enhance existing town, local and other centre assets. The only time removal of an existing facility will be acceptable is when an equivalent service will be established in an area easily accessible by the local community.
- 6.16. Representations from the developers promoting the Stafford Strategic Development Locations called for Policy E8 to be amended, to include village and neighbourhood shops as part of these proposals. The Borough Council considers that this approach would support local needs of new communities at the SDLs. In addition Eccleshall has been identified as a separate category to village and neighbourhood shops due to the level of retail provision at this settlement. Therefore the Schedule of Additional (Minor) Modifications (A26) identifies a proposed change listed as M66.