

**New Stafford Borough
Local Plan 2020 - 2040:
Issues and Options
Responses**

**Agents and
Developers -
Part 2**

3 February - 21 April 2020

Coding	Name:	Organisation:	Page Number
65	Mrs Tonge	Hixon Airfield Services	1
66	Muller Property Group	Muller Property Group	29
67	Aston Homes Land Ltd	Aston Homes Land Ltd	40
68	PW SHAW	PW SHAW, land at Queensville, Stafford	53
69	Millwood Land (Stafford)	Millwood Land (Stafford)	66
70	Mr N Ash	Mr N Ash	78
71	P W Shaw , Burston Villa Farm	P W Shaw	90
72	Sally Tagg	National and Custom Self Build Association (NaCSBA)	103
73	Gillan Paris	Inglewood Investments	110
74	Richborough Estates (Land at Horseshoe, Gnosall)	Richborough Estates	115
75	Richborough Estates (Land at Uttoxeter Road, Stone)	Richborough Estates	163
76	Matthew Stafford	St Modwen Properties PLC	214
77	Staffordshire University	The Leith Planning Group	259
78	Baden Hall Estate	Baden Hall Estate	266
79	Trent Vision Trust	Aspbury Planning Limited	276
80	St Philips, Land to the East of Castle Street, Eccleshall	Avison Young	278
81	Taylor Wimpey, Land North of Shaws Lane, Eccleshall	Taylor Wimpey North Midlands	359

**New Stafford Borough Local Plan 2020-2040
 “Issues and Options” Consultation - Response Form**

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent’s Details (if applicable)
Title	Mrs	Mr
First Name	June	Paul
Surname	Tonge	Instone
E-mail address		
Job title (if applicable)		Director
Organisation (if applicable)	Mrs June Tonge trading as Hixon Airfield Services	Applied Town Planning Ltd
Address		
Postcode		
Telephone Number		

Thank you for taking the time to provide your comments on the “Issues and Options” document for the Stafford Borough Local Plan 2020-2040. All comments will be considered when preparing the Preferred Options for the New Local Plan.

Please return this form either by email (preferred) to: forwardplanning@staffordbc.gov.uk

or by post to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ

Please ensure receipt by Stafford Borough Council **by 12.00 noon Tuesday 31 March 2020.**

For advice on how to respond to the consultation and how to fill in this form, please see the Consultation Guidance Notes on the Council’s website at: www.staffordbc.gov.uk/new-local-plan or call 07800 619636 / 07800 619650.

Please note:

- Comments must be received by 12noon on Tuesday 31 March 2020. Late comments will be considered “not duly made” under the Regulations;

- Please fill in a separate Part B for each question/paragraph/table/topic you are commenting on and, where necessary, please explain your response;
- Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name		Organisation Hixon Airfield Services			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	Key Objective 24 Page 29	Paragraph		Table	
Figure		Question		Other	
2. Please set out your comments below					
<p>Hixon Airfield Services welcomes key objectives being set for areas outside Stafford and Stone, but consider that that the role and function of key services villages should be explicitly recognised.</p> <p>Within the areas outside of Stafford and Stone, Hixon Airfield Services wholly supports the strategy to deliver new employment land through the expansion of existing industrial areas. This objective will help create conditions in which businesses can invest, expand and adapt, supporting economic growth and productivity taking into account local business needs and wider opportunities for development as required by the NPPF. The NPPF also states that planning policies should enable the growth and expansion of all types of businesses in rural areas, including through the construction of well designed new buildings, and Key Objective 24 is in accordance with national planning policy to support a prosperous rural economy and is welcomed.</p> <p>The objective to deliver new employment land through the expansion of existing industrial areas is considered the most appropriate strategy to meet local business and community needs in rural areas. The Stafford Borough Council Economic and Housing Development Needs Assessment (EHDNA) recognises at paragraph 6.12 that the existing Industrial Estates in the smaller rural settlements, particularly in Hixon (amongst others), <i>‘provide a very important role in providing rural jobs in close proximity to local residents, making settlements more sustainable and often comprising highly attractive places to work’</i>.</p> <p>The established employment areas already have the supporting infrastructure to support economic growth in rural areas and are already assimilated into their local environments delivering economic growth whilst being sensitive to their surroundings. The established employment areas, including Hixon Airfield Industrial Estate, also already benefit from the key factors firms are looking for when choosing employment sites, as identified in the EHDNA including:</p> <ul style="list-style-type: none"> • physical connectivity (particularly road links); • land for free carparking or yards for storage/parking for work vehicles; and, • no restrictions/uncontaminated land where development is likely to be viable. 					

These existing successful areas which benefit from the key factors firms are looking for when choosing employment locations should be encouraged and expanded so that they can continue to provide locations for new and existing businesses within the Borough, attract new businesses into the Borough, and continue the very important role they provide in supporting economic growth and making settlements more sustainable.

As recognised in the EHDNA it is also case that existing rural industrial estates, including Hixon Airfield Industrial Estate, offer greater potential for businesses to expand compared to some of the more enclosed urban estates and are typically easier to redevelop for other industrial uses. An objective to focus future growth on expanding these Industrial Estates is therefore also more deliverable and there is greater certainty of meeting the employment land needs of the Borough.

An objective to expand these existing areas is considered the most sustainable strategy to deliver the economic objectives of the NPPF to help build a strong, responsive and competitive economy, ensuring that sufficient land of the right types is available in the right places to ensure economic growth. Similarly, a strategy to expand existing industrial areas into appropriate locations will have the least impact on the natural environment and residential amenity as these existing industrial areas are already established and assimilated into their local context.

Please use a continuation sheet if necessary

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name		Organisation Hixon Airfield Services			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	5.D i.	Other	
2. Please set out your comments below					
<p>Hixon Airfield Services supports the identification of Hixon as a ‘Large Settlement’ in the settlement hierarchy. This categorisation recognises the role of function of Hixon in providing a focal point for employment and services to the wider community.</p>					

Part B: Your Comments	
<i>Please complete a new Part B for each representation you wish to make.</i>	

Name		Organisation Hixon Airfield Services			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	5.G	Other	
2. Please set out your comments below					
<p>Hixon Airfield Services is a significant land owner of land to the western edge of Hixon which comprises a former ex-WW2 airfield and the adjoining industrial estate. The land owned by Hixon Airfield Services is within and adjacent to the parcel of land which is identified as development option (vi)(E) ‘Hixon’ in the Reasonable Alternative Study (RAS) prepared by AECOM. Importantly, the land owned by Hixon Airfield Services connects the residential core of Hixon to the wider area of land being considered for development.</p> <p>Hixon Airfield Services confirm that they would be willing to work with adjoining landowners to bring forward the delivery of a Garden Community within this area.</p>					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name		Organisation Hixon Airfield Services			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	5.H	Other	
2. Please set out your comments below					
<p>Hixon Airfield Services consider that a Growth Strategy should be implemented which ensures development is brought forward across the Borough, including within the Large Settlements which includes Hixon. This approach is the most appropriate strategy to deliver sustainable communities and deliver a sustainable settlement hierarchy. Therefore, Growth Options 3 and 5 are considered the most appropriate development strategies.</p>					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name		Organisation Hixon Airfield Services			
2. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	5.k	Other	
2. Please set out your comments below					

The Stafford Borough Council Economic and Housing Development Needs Assessment (EHDNA) recommends an employment land allocation range for the Council of between 68 and 181 ha between 2020 and 2040. The selection of the final employment land requirement will depend upon the preferred level of employment growth for the Borough and the extent to which Officers consider that this aligns with the Council's economic aspirations and housing targets, including the need to reduce net out commuting.

The ENDNA utilises a number of models to calculate the employment land requirement between 2020 and 2040 and all of these models have strengths and weaknesses and no model is going to be wholly accurate due to the uncertainties and assumptions in each model.

The most important factor is to ensure that there is sufficient employment land available within the Borough to deliver economic growth and ensure that economic opportunities are not stifled by restrictive planning policies.

There are a number of indicators with the EHDNA which demonstrate that the need for employment land will be higher than anticipated including growth aspirations arising from HS2 and other regeneration projects in the Borough.

The NPPF is clear that planning policies should enable the growth and expansion of all types of businesses and the key economic objective of the NPPF is to ensure that there is sufficient land available in the right places and at the right time. It is therefore essential that the planning authority take a cautious approach to the economic modelling in the ENDNA, given the uncertainties in the models, and allocate enough land to ensure sufficient land is available to support the Council's economic aspirations.

The Chamber of Commerce stated that it is important that sufficient land is available to allow existing businesses in the Borough to expand when required, rather than expansion forcing businesses to relocate and potentially leading to them moving outside the Borough. The planning authority should heed this warning.

The availability of employment land will in itself be a driver of economic growth encouraging business to locate into Stafford Borough, and allowing existing businesses to expand without businesses having to leave the Borough searching for alternative sites. If employment land is ultimately not developed during the plan period due to an oversupply in the plan then it is considered that there is no harm in having an oversupply in the medium term and the benefits of ensuring that there is a sufficient employment land supply in terms of securing economic growth significantly outweigh any harm which could be caused by implementing a cautious economic model.

For these reasons, the planning authority should plan for 181ha between 2020 and 2040. The EHDNA identifies that the 165ha requirement based on past take up rates represents a valid figure going forward over the remainder of the plan period and recognises that long term completion rates of employment floorspace can provide a reasonable basis for informing future land needs. Therefore, allowing for a flexibility factor, the requirement for 181 ha is considered a robust and sound approach to ensure that future economic growth is not stifled by restrictive planning policy.

In terms of the split of (B1a/B1b) and (B1c/B2 and B8) employment land; the EHDNA identifies that the AMR data suggests that around 20% of B-Class floorspace was for B1a/b office; 14% was for B1c/B2 industrial; 52% was for B8 Storage and Distribution, and the remaining 15% was unspecified General B-Uses. Excluding this latter category, this equates to 23% of floorspace being specified as office, 16% as industrial and 61% warehousing.

It is established that past take up rates represent a valid figure going forward over the remainder of the plan period, and it is recognised that some sectors of the manufacturing industry are in growth. Past growth trends indicated that 77% of B Class floorspace was for B1C/B2 and B8 uses and as historical trends provide a robust indication going forward the planning authority should allocate land on this basis. However, it is considered that employment land policy should not be overly prescriptive on the employment use class which can come forward on allocated sites, as overly prescriptive employment land policy could stifle economic growth.

Part B: Your Comments

Please complete a new Part B for each representation you wish to make.

Name	Organisation Hixon Airfield Services
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1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?

Section	Paragraph	Table
Figure	Question 5.L	Other

2. Please set out your comments below

Hixon Airfield Services believe it is essential that the employment land supply calculations robustly compensate for any loss of employment land to alternative uses to ensure that there is adequate employment land supply to ensure Stafford has a strong, responsive and competitive economy.

It is a widely accepted approach in calculating future employment land needs that it is necessary for there to be an allowance for the replacement of losses of employment land and this is a necessary requirement to avoid a decline in the quality of employment land stock and ensure that the commercial requirements of modern businesses are met.

The Stafford Borough Council Economic and Housing Development Needs Assessment (EHDNA) assumes an allowance of 2.41 ha of employment land annually in the Borough, or 48.20 ha over the 20-year plan period derived from the trend over the last 10 years.

It is considered that this approach is overly conservative and does not adequately take account of the effect of employment to residential permitted development rights which will increase the loss of employment buildings, including B8 buildings over the longer term.

Consequently, to allow for a potential uplift in the loss of employment land above relatively short term historic trends, it is recommended that the alternative approach put forward in the EHDNA is implemented; namely, applying a 'churn equivalent' to 1% of the Borough's existing stock per annum, which it is noted is the strategy in Lichfield District which is an employment destination which competes with Stafford.

It is understood that this would equate to a demand for around 3.2ha per annum which is higher than the 2.41ha modelled in the EHDNA. Whilst it is recognised that employment land supply modelling is not a precise science, it is concerning that the 2.41ha per annum figure which has been applied is considered by Lichfields, the authors of the EHDNA, to be '*on the conservative side*'.

It is essential that sufficient land is available to support economic growth in the Borough to meet the needs of business, and given that it is likely that the loss of employment land will accelerate through Government policy to increase the supply of housing including through permitted development rights, it is considered inappropriate and high risk to implement a 'conservative strategy' for the replacement of employment land stock which may ultimately stifle economic growth.

It is therefore considered that a replacement employment land rate of 3.2 ha per annum should be utilised to ensure that the economic objectives of the NPPF are fully met.

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name		Organisation Hixon Airfield Services			
1. Which part of the New Local Plan 2020-2040 "Issues and Options" consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	5.M	Other	
2. Please set out your comments below					
<p>Hixon Airfield Services believe that the spatial distribution for new employment land should mirror the spatial distribution for new employment prescribed by the current Local Plan. Stafford Borough has a number of significant rural employment concentrations, which provide a focus for new development to support a prosperous rural economy outside of Stafford and Stone.</p> <p>It is essential that the existing Recognised Industrial Estates are allowed to expand providing opportunities for new investment as well as enabling existing firms to expand during the plan period within rural areas. The expansion of Recognised Industrial Estates underpins a sustainable settlement hierarchy providing opportunities for the growth in the economy in rural areas. This approach supports a sustainable settlement hierarchy by providing jobs in locations which reduces the needs to travel and ensures that sufficient land is available of the right type, in the right location and at the right time to support economic growth.</p> <p>Even if the local planning authority choose to go forward with a new garden community/major urban extension, it is essential that employment land continues to be</p>					

allocated on the basis of providing spatial distribution across the Borough to support economic growth across the Borough as a whole. To concentrate all new employment land within new communities would neglect the principles of sustainable development and the requirements to ensure that sufficient land is brought forward to meet the needs of economic growth within communities.

Whilst it is recognised that the Stafford Plan is prepared on a Borough Wide basis, it must not neglect the fact that the Borough Area covers many communities, and economic opportunities must not be lost for investment in existing areas at the expense of growth in the economy within the wider area. Hixon Airfield Services have previously set out that the most robust mechanism for calculating employment land supply requirements is through the extrapolation of past take up rates, and this approach indicates that there is a continued need for additional employment land in Hixon which is an area which is recognised as being attractive for business. The Stafford Borough Council Strategic Development Site Options Report (SDOR) prepared by Aecom recognises that Hixon Airfield is a suitable location for economic development and is an area which attracts major business with a good concentration of employment and the role and function of the Recognised Industrial Estates must be supported and encouraged in the plan process so that the economic needs of existing communities continue to be met.

Hixon Airfield Services strongly believe that the distribution of new employment land must not just be underpinned by a purely quantitative exercise, focused around areas of new population growth. The plan process must not purely be focussed on a quantitative process to deliver employment land based on the future concentrations of population growth within small geographic zones with Stafford. It is essential that whatever growth strategy is implemented in the plan that there is a spatial distribution of employment land across the Borough which meets the needs of existing as well as future communities. The spatial distribution of existing take up rates provides an important indicator of the spatial need for future employment land.

To achieve both the quantitative employment land requirements of new population hubs, alongside serving the economic needs of the existing community and implementing a spatial dispersion policy to employment land provision, may ultimately mean that higher amounts of employment land are required to be allocated, but this approach will ensure that the employment land needs of both existing and future communities are met.

It is also an important consideration that any future Garden Community/Major Urban Community would come forward towards the end of the plan period, and the employment land within these new communities is likely to come forward in the later stages of the development due to development economics of delivering housing in the first instance. It is therefore essential that the needs of existing communities are met in the intervening period and employment land must therefore be continued to be allocated within and adjacent to the existing Recognised Industrial Estates to meet the needs of existing communities.

For these reasons it is recommended that the new plan mirrors the spatial distribution for employment land in the current plan. However, even if Stafford Borough chooses to go forward with a new Garden Community/Major Urban Extension the employment land policy should focus on both the needs of the new and existing communities and ensure that there is a spatial distribution of employment land available have regarding to past

take up rates. This is the most robust mechanism to ensure that the right land is available at the right time in the right places to support economic growth.

Part B: Your Comments

Please complete a new Part B for each representation you wish to make.

Name	Organisation Hixon Airfield Services				
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	5.N	Other	

2. Please set out your comments below

As set out previously, Hixon Airfield Services believe that the spatial distribution for new employment land should mirror the spatial distribution for new employment prescribed by the current Local Plan. Stafford Borough has a number of significant rural employment concentrations, which provide a focus for new development to support a prosperous rural economy outside of Stafford and Stone.

It is essential that the existing Recognised Industrial Estates are allowed to expand providing opportunities for new investment as well as enabling existing firms to expand during the plan period within rural areas. The expansion of Recognised Industrial Estates underpins a sustainable settlement hierarchy providing opportunities for growth in the economy in rural areas. This approach supports a sustainable settlement hierarchy by providing jobs in locations which reduces the needs to travel and ensures that sufficient land is available of the right type, in the right location and at the right time to support economic growth.

Therefore the scenario in which a new Garden Settlement comes forward and no employment land is allocated in the rest of the Borough is wholly unreasonable. This would stifle economic growth within the Borough and be harmful to the economy of Stafford Borough as there would be no long-term opportunities for businesses to start, expand and relocate in rural areas. This approach would be in direct conflict with the economic objectives of the NPPF to deliver the right type of land in the right places at the right time to support economic growth. A scenario which allocates no land within the Rest of Borough would conflict with the Core Objectives of the NPPF and would be contrary to national policy and would result in a policy which was unsound and not fit for purpose. Hixon Airfield Services would strongly object to the soundness and reasonableness of a Strategy which did not allocate any employment land within the rest of the Borough.

Hixon Airfield Services strongly believe that the distribution of new employment land must not just be underpinned by a purely quantitative exercise, focused around areas of new population growth. It is essential that whatever growth strategy is implemented in the plan that there is a spatial distribution of employment land across the Borough which meets the needs of existing as well as future communities, as the spatial distribution of existing take up rates provides an important indicator of the spatial need for future employment land.

It is also an important consideration that any future Garden Community/Major Urban Community would not come forward until towards the end of the plan period, and the employment land within these new communities is likely to come forward in the later stages of the development due to development economics of delivering housing in the first instance. It is essential that the needs of existing communities are met in the intervening period and employment land must therefore continue to be allocated within and adjacent to the existing Recognised Industrial Estates to meet the needs of existing communities.

In terms of the spatial distribution of employment land in a no garden community scenario, the plan is considering a strategy whereby between 10 and 40% of new employment land is allocated within the Rest of the Borough. Hixon Airfield Services strongly believe that at least 40% of new employment land should be allocated in the Rest of the Borough. The Plan process must have regard to the type of employment which will be delivered in geographic areas. The employment profile of business within the principle settlements in the Borough will be reflective of the economy within those areas – primarily being employment in public services, offices, retail and the service economy. Town centre uses planning policy directs these businesses to defined centre locations onto sites which are not specifically allocated for employment uses and the density of employment within these businesses is higher which means that less employment land is required in these urban locations.

By contrast, the past take up rates at Hixon Airfield Industrial Estate demonstrate that it is primarily manufacturing and storage and distribution businesses which locate into these locations, albeit it must be recognised that Hixon Airfield is currently seeking to encourage higher value businesses to the industrial estate as demonstrated by the high quality scheme (planning application reference 19/31520/REM) currently being determined by the planning authority. The distribution of employment land provision must have regard to the land requirements of businesses within Recognised Industrial Estates. Businesses in these locations provide a fundamental component of the economy and there must be adequate land available in the locations in which they choose to operate to ensure economic growth is not stifled.

For these reasons, Hixon Airfield Services strongly believe that at least 40% of new employment land should be allocated in the Rest of the Borough.

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name		Organisation Hixon Airfield Services			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	5.0	Other	
2. Please set out your comments below					
Hixon Airfield Services are promoting a 6.65 ha site for development. The site comprises a parcel of land which would form a logical extension to the defined Hixon Airfield Industrial Estate and would ‘round off’ the allocation boundary and has the potential to be					

brought forward as a high quality industrial estate alongside the land to the south which benefits from outline planning permission 14/20587/OUT.

A 'Call for Sites' form has been submitted to the planning authority which fully sets out the rationale for allocating the site for development.

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name		Organisation Hixon Airfield Services			
1. Which part of the New Local Plan 2020-2040 "Issues and Options" consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	6.A	Other	
2. Please set out your comments below					
<p>Hixon Airfield Services consider that the three scenarios put forward in Table 6.1 under-represent potential future job growth as the 'Past Take Up Rate' scenario has been discounted without justification.</p> <p>The Stafford Borough Council Economic and Housing Development Needs Assessment (EHDNA) recommends an employment land range for the Council of between 68 and 181ha between 2020 and 2040. For reasons set out in this submission, Hixon Airfield Services considered that 'Past Take Up Rate' scenario is the most robust model.</p> <p>This scenario has not been included in Table 6.1 and it is considered that the Plan should include a scenario for job growth based on a continuation of past take up rates to ensure sufficient employment land is allocated to deliver economic growth.</p> <p>Similarly, the distribution between business classes should have regard to past take up rates which will demonstrate the high demand for industrial and distribution floorspace within the Recognised Industrial Estates, particularly in Hixon.</p>					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name		Organisation Hixon Airfield Services			
1. Which part of the New Local Plan 2020-2040 "Issues and Options" consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	6.B	Other	
2. Please set out your comments below					

Hixon Airfield Services believe that to ensure economic prosperity, the Council should allocate land so that it extends existing employment premises across the Borough. This should occur in both urban and rural areas.

The Stafford Borough Council Strategic Development Site Options Report (SDOR) prepared by Aecom recognises that Hixon Airfield is a suitable location for economic development and is an area which attracts major business with a good concentration of employment. The role and function of the Recognised Industrial Estate must be supported and encouraged in the plan process so that economic needs of existing communities continue to be met so that the employment land is available in the right places.

The established employment areas already have the supporting infrastructure to support economic growth in rural areas and are already assimilated into their local environments delivering economic growth whilst being sensitive to their surroundings. The established employment areas, including Hixon Airfield Industrial Estate, also already benefit from the key factors firms are looking for when choosing employment sites, as identified in the EHDNA including:

- physical connectivity (particularly road links);
- land for free carparking or yards for storage/parking for work vehicles; and,
- no restrictions/uncontaminated land where development is likely to be viable.

The existing Recognised Industrial Estates provide clusters of employment provision throughout the District and these important economic hubs should be supported and encouraged so that they continue to meet the economic needs of the Borough. A strategy to expand the existing Recognised Industrial Estates is considered a sustainable strategy to deliver the employment land supply whilst limiting landscape and environment impacts.

For example, Hixon Airfield Services have put forward a 6.65 ha site for development. The site comprises a parcel of land which would form a logical extension to the Hixon Airfield Industrial Estate and would 'round off' the allocation boundary. The site has the potential to be brought forward as a high quality industrial estate alongside the land to the south which benefits from outline planning permission 14/20587/OUT. Given the context of the site any landscape harm arising from a proposal for employment uses on this site would be negligible.

This provides an example of the benefits of a common sense approach of seeking to extend existing employment areas, which are capable of being delivered in a timely manner with negligible detrimental impacts. For these reasons it is considered that a strategy to expand existing employment areas should be the preferred option.

Part B: Your Comments

Please complete a new Part B for each representation you wish to make.

Name

Organisation Hixon Airfield Services

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	6.C	Other	
2. Please set out your comments below					
<p>Hixon Airfield Services consider that there would be substantial economic benefits arising from the extension to Hixon Airfield Industrial Estate for the local community as well as Stafford Borough as a whole.</p> <p>The Stafford Borough Council Strategic Development Site Options Report (SDOR) prepared by Aecom recognises that Hixon Airfield is a suitable location for economic development and is an area which attracts major business with a good concentration of employment.</p> <p>This Stafford Plan should recognise and encourage the growth of successful employment locations which have been demonstrated by the market to be successful and desirable areas.</p> <p>The NPPF states that in order to build a strong and competitive economy an approach should be taken that allows areas to build on its strengths. An extension to Hixon Airfield Industrial Estate would be taking an approach which builds on the strengths of this successful employment location, and allowing an expansion of the cluster of businesses in this location would benefit both the local and wider economy.</p>					

Part B: Your Comments					
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Name		Organisation Hixon Airfield Services			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	6.H	Other	
2. Please set out your comments below					
<p>Stafford Borough has a number of significant rural employment concentrations which provide a focus for new development to support a prosperous rural economy outside of Stafford and Stone. It is considered that to assist the rural economy, existing Recognised Industrial Estates such as Hixon Airfield Industrial Estate, which are well located to serve the rural economy, should be expanded to provide opportunities for new investment as well as enabling existing firms to expand during the plan period within rural areas.</p> <p>The expansion of Recognised Industrial Estates underpins a sustainable settlement hierarchy providing opportunities for growth in the economy in rural areas, by providing jobs in locations which reduces the needs to travel and ensures that sufficient land is available of the right type, in the right location and at the right time to support economic growth.</p>					

All comments should be made in writing preferably using this form and should be received by Stafford Borough Council **no later than 12 noon Tuesday 31 March 2020**.

You can view the documents online at www.staffordbc.gov.uk/new-local-plan-

Please e-mail your comments (Preferred) to: forwardplanning@staffordbc.gov.uk

or post your comments to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ

Thank you for taking the time to contribute to this consultation.

NEW LOCAL PLAN 2020-2040: ISSUES & OPTIONS

STAFFORD BOROUGH COUNCIL – PRIVACY NOTICE

How we will use your details

All representations received to the Stafford Borough New Local Plan 2020-2040 Issues & Options consultation document will be included in a schedule and made publicly available once the consultation has closed.

Stafford Borough Council will consider all representations received, using them to inform the next stage of the process for the New Local Plan 2020-2040.

Comments cannot be treated as confidential. Your personal information, such as your postal and email address will not be published and signatures will be redacted, but your name and organisation will be made available. We will only use your personal information to send you information on the New Local Plan and associated planning policy matters.

We believe you should always know what data we collect from you and how we use it, and that you should have meaningful control over both. As part of our ongoing commitment to transparency, and in relation to the new General Data Protection Regulations (May 2018), we have updated our Privacy Policy.

Stafford Borough Council are the data controller and you can find information about how we handle your personal data by visiting www.staffordbc.gov.uk/privacynotices and if you have any queries or would like to unsubscribe from receiving information then please contact forwardplanningconsultations@staffordbc.gov.uk

**New Stafford Borough Local Plan 2020-2040
 “Issues and Options” Consultation - Response Form**

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent’s Details (if applicable)
Title	Mrs	Mr
First Name	June	Paul
Surname	Tonge	Instone
E-mail address		
Job title (if applicable)		Director
Organisation (if applicable)	Mrs June Tonge trading as Hixon Airfield Services	Applied Town Planning Ltd
Address		
Postcode		
Telephone Number		

Thank you for taking the time to provide your comments on the “Issues and Options” document for the Stafford Borough Local Plan 2020-2040. All comments will be considered when preparing the Preferred Options for the New Local Plan.

Please return this form either by email (preferred) to: forwardplanning@staffordbc.gov.uk

or by post to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ

Please ensure receipt by Stafford Borough Council **by 12.00 noon Tuesday 31 March 2020.**

For advice on how to respond to the consultation and how to fill in this form, please see the Consultation Guidance Notes on the Council’s website at: www.staffordbc.gov.uk/new-local-plan- or call 07800 619636 / 07800 619650.

Please note:

- Comments must be received by 12noon on Tuesday 31 March 2020. Late comments will be considered “not duly made” under the Regulations;

- Please fill in a separate Part B for each question/paragraph/table/topic you are commenting on and, where necessary, please explain your response;
- Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name		Organisation Hixon Airfield Services			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	Key Objective 24 Page 29	Paragraph		Table	
Figure		Question		Other	
2. Please set out your comments below					
<p>Hixon Airfield Services welcomes key objectives being set for areas outside Stafford and Stone, but consider that that the role and function of key services villages should be explicitly recognised.</p> <p>Within the areas outside of Stafford and Stone, Hixon Airfield Services wholly supports the strategy to deliver new employment land through the expansion of existing industrial areas. This objective will help create conditions in which businesses can invest, expand and adapt, supporting economic growth and productivity taking into account local business needs and wider opportunities for development as required by the NPPF. The NPPF also states that planning policies should enable the growth and expansion of all types of businesses in rural areas, including through the construction of well designed new buildings, and Key Objective 24 is in accordance with national planning policy to support a prosperous rural economy and is welcomed.</p> <p>The objective to deliver new employment land through the expansion of existing industrial areas is considered the most appropriate strategy to meet local business and community needs in rural areas. The Stafford Borough Council Economic and Housing Development Needs Assessment (EHDNA) recognises at paragraph 6.12 that the existing Industrial Estates in the smaller rural settlements, particularly in Hixon (amongst others), <i>‘provide a very important role in providing rural jobs in close proximity to local residents, making settlements more sustainable and often comprising highly attractive places to work’</i>.</p> <p>The established employment areas already have the supporting infrastructure to support economic growth in rural areas and are already assimilated into their local environments delivering economic growth whilst being sensitive to their surroundings. The established employment areas, including Hixon Airfield Industrial Estate, also already benefit from the key factors firms are looking for when choosing employment sites, as identified in the EHDNA including:</p> <ul style="list-style-type: none"> • physical connectivity (particularly road links); • land for free carparking or yards for storage/parking for work vehicles; and, • no restrictions/uncontaminated land where development is likely to be viable. <p>These existing successful areas which benefit from the key factors firms are looking for</p>					

when choosing employment locations should be encouraged and expanded so that they can continue to provide locations for new and existing businesses within the Borough, attract new businesses into the Borough, and continue the very important role they provide in supporting economic growth and making settlements more sustainable.

As recognised in the EHDNA it is also case that existing rural industrial estates, including Hixon Airfield Industrial Estate, offer greater potential for businesses to expand compared to some of the more enclosed urban estates and are typically easier to redevelop for other industrial uses. An objective to focus future growth on expanding these Industrial Estates is therefore also more deliverable and there is greater certainty of meeting the employment land needs of the Borough.

An objective to expand these existing areas is considered the most sustainable strategy to deliver the economic objectives of the NPPF to help build a strong, responsive and competitive economy, ensuring that sufficient land of the right types is available in the right places to ensure economic growth. Similarly, a strategy to expand existing industrial areas into appropriate locations will have the least impact on the natural environment and residential amenity as these existing industrial areas are already established and assimilated into their local context.

Please use a continuation sheet if necessary

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name		Organisation Hixon Airfield Services			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	5.D i.	Other	
2. Please set out your comments below					
<p>Hixon Airfield Services supports the identification of Hixon as a ‘Large Settlement’ in the settlement hierarchy. This categorisation recognises the role of function of Hixon in providing a focal point for employment and services to the wider community.</p>					

Part B: Your Comments	
<i>Please complete a new Part B for each representation you wish to make.</i>	
Name	Organisation Hixon Airfield Services

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	5.G	Other	
2. Please set out your comments below					
<p>Hixon Airfield Services is a significant land owner of land to the western edge of Hixon which comprises a former ex-WW2 airfield and the adjoining industrial estate. The land owned by Hixon Airfield Services is within and adjacent to the parcel of land which is identified as development option (vi)(E) ‘Hixon’ in the Reasonable Alternative Study (RAS) prepared by AECOM. Importantly, the land owned by Hixon Airfield Services connects the residential core of Hixon to the wider area of land being considered for development.</p> <p>Hixon Airfield Services confirm that they would be willing to work with adjoining landowners to bring forward the delivery of a Garden Community within this area.</p>					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name		Organisation Hixon Airfield Services			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	5.H	Other	
2. Please set out your comments below					
<p>Hixon Airfield Services consider that a Growth Strategy should be implemented which ensures development is brought forward across the Borough, including within the Large Settlements which includes Hixon. This approach is the most appropriate strategy to deliver sustainable communities and deliver a sustainable settlement hierarchy. Therefore, Growth Options 3 and 5 are considered the most appropriate development strategies.</p>					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name		Organisation Hixon Airfield Services			
2. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	5.k	Other	
2. Please set out your comments below					

The Stafford Borough Council Economic and Housing Development Needs Assessment (EHDNA) recommends an employment land allocation range for the Council of between 68 and 181 ha between 2020 and 2040. The selection of the final employment land requirement will depend upon the preferred level of employment growth for the Borough and the extent to which Officers consider that this aligns with the Council's economic aspirations and housing targets, including the need to reduce net out commuting.

The ENDNA utilises a number of models to calculate the employment land requirement between 2020 and 2040 and all of these models have strengths and weaknesses and no model is going to be wholly accurate due to the uncertainties and assumptions in each model.

The most important factor is to ensure that there is sufficient employment land available within the Borough to deliver economic growth and ensure that economic opportunities are not stifled by restrictive planning policies.

There are a number of indicators with the EHDNA which demonstrate that the need for employment land will be higher than anticipated including growth aspirations arising from HS2 and other regeneration projects in the Borough.

The NPPF is clear that planning policies should enable the growth and expansion of all types of businesses and the key economic objective of the NPPF is to ensure that there is sufficient land available in the right places and at the right time. It is therefore essential that the planning authority take a cautious approach to the economic modelling in the ENDNA, given the uncertainties in the models, and allocate enough land to ensure sufficient land is available to support the Council's economic aspirations.

The Chamber of Commerce stated that it is important that sufficient land is available to allow existing businesses in the Borough to expand when required, rather than expansion forcing businesses to relocate and potentially leading to them moving outside the Borough. The planning authority should heed this warning.

The availability of employment land will in itself be a driver of economic growth encouraging business to locate into Stafford Borough, and allowing existing businesses to expand without businesses having to leave the Borough searching for alternative sites. If employment land is ultimately not developed during the plan period due to an over-supply in the plan then it is considered that there is no harm in having an oversupply in the medium term and the benefits of ensuring that there is a sufficient employment land supply in terms of securing economic growth significantly outweigh any harm which could be caused by implementing a cautious economic model.

For these reasons, the planning authority should plan for 181ha between 2020 and 2040. The EHDNA identifies that the 165ha requirement based on past take up rates represents a valid figure going forward over the remainder of the plan period and recognises that long term completion rates of employment floorspace can provide a reasonable basis for informing future land needs. Therefore, allowing for a flexibility factor, the requirement for 181 ha is considered a robust and sound approach to ensure that future economic growth is not stifled by restrictive planning policy.

In terms of the split of (B1a/B1b) and (B1c/B2 and B8) employment land; the EHDNA identifies that the AMR data suggests that around 20% of B-Class floorspace was for B1a/b office; 14% was for B1c/B2 industrial; 52% was for B8 Storage and Distribution, and the remaining 15% was unspecified General B-Uses. Excluding this latter category, this equates to 23% of floorspace being specified as office, 16% as industrial and 61% warehousing.

It is established that past take up rates represent a valid figure going forward over the remainder of the plan period, and it is recognised that some sectors of the manufacturing industry are in growth. Past growth trends indicated that 77% of B Class floorspace was for B1C/B2 and B8 uses and as historical trends provide a robust indication going forward the planning authority should allocate land on this basis. However, it is considered that employment land policy should not be overly prescriptive on the employment use class which can come forward on allocated sites, as overly prescriptive employment land policy could stifle economic growth.

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name		Organisation Hixon Airfield Services			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	5.L	Other	
2. Please set out your comments below					
<p>Hixon Airfield Services believe it is essential that the employment land supply calculations robustly compensate for any loss of employment land to alternative uses to ensure that there is adequate employment land supply to ensure Stafford has a strong, responsive and competitive economy.</p> <p>It is a widely accepted approach in calculating future employment land needs that it is necessary for there to be an allowance for the replacement of losses of employment land and this is a necessary requirement to avoid a decline in the quality of employment land stock and ensure that the commercial requirements of modern businesses are met.</p> <p>The Stafford Borough Council Economic and Housing Development Needs Assessment (EHDNA) assumes an allowance of 2.41 ha of employment land annually in the Borough, or 48.20 ha over the 20-year plan period derived from the trend over the last 10 years.</p> <p>It is considered that this approach is overly conservative and does not adequately take account of the effect of employment to residential permitted development rights which will increase the loss of employment buildings, including B8 buildings over the longer term.</p>					

Consequently, to allow for a potential uplift in the loss of employment land above relatively short term historic trends, it is recommended that the alternative approach put forward in the EHDNA is implemented; namely, applying a 'churn equivalent' to 1% of the Borough's existing stock per annum, which it is noted is the strategy in Lichfield District which is an employment destination which competes with Stafford.

It is understood that this would equate to a demand for around 3.2ha per annum which is higher than the 2.41ha modelled in the EHDNA. Whilst it is recognised that employment land supply modelling is not a precise science, it is concerning that the 2.41ha per annum figure which has been applied is considered by Lichfields, the authors of the EHDNA, to be '*on the conservative side*'.

It is essential that sufficient land is available to support economic growth in the Borough to meet the needs of business, and given that it is likely that the loss of employment land will accelerate through Government policy to increase the supply of housing including through permitted development rights, it is considered inappropriate and high risk to implement a 'conservative strategy' for the replacement of employment land stock which may ultimately stifle economic growth.

It is therefore considered that a replacement employment land rate of 3.2 ha per annum should be utilised to ensure that the economic objectives of the NPPF are fully met.

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name		Organisation Hixon Airfield Services			
1. Which part of the New Local Plan 2020-2040 "Issues and Options" consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	5.M	Other	
2. Please set out your comments below					
<p>Hixon Airfield Services believe that the spatial distribution for new employment land should mirror the spatial distribution for new employment prescribed by the current Local Plan. Stafford Borough has a number of significant rural employment concentrations, which provide a focus for new development to support a prosperous rural economy outside of Stafford and Stone.</p> <p>It is essential that the existing Recognised Industrial Estates are allowed to expand providing opportunities for new investment as well as enabling existing firms to expand during the plan period within rural areas. The expansion of Recognised Industrial Estates underpins a sustainable settlement hierarchy providing opportunities for the growth in the economy in rural areas. This approach supports a sustainable settlement hierarchy by providing jobs in locations which reduces the needs to travel and ensures that sufficient land is available of the right type, in the right location and at the right time to support economic growth.</p> <p>Even if the local planning authority choose to go forward with a new garden community/major urban extension, it is essential that employment land continues to be</p>					

allocated on the basis of providing spatial distribution across the Borough to support economic growth across the Borough as a whole. To concentrate all new employment land within new communities would neglect the principles of sustainable development and the requirements to ensure that sufficient land is brought forward to meet the needs of economic growth within communities.

Whilst it is recognised that the Stafford Plan is prepared on a Borough Wide basis, it must not neglect the fact that the Borough Area covers many communities, and economic opportunities must not be lost for investment in existing areas at the expense of growth in the economy within the wider area. Hixon Airfield Services have previously set out that the most robust mechanism for calculating employment land supply requirements is through the extrapolation of past take up rates, and this approach indicates that there is a continued need for additional employment land in Hixon which is an area which is recognised as being attractive for business. The Stafford Borough Council Strategic Development Site Options Report (SDOR) prepared by Aecom recognises that Hixon Airfield is a suitable location for economic development and is an area which attracts major business with a good concentration of employment and the role and function of the Recognised Industrial Estates must be supported and encouraged in the plan process so that the economic needs of existing communities continue to be met.

Hixon Airfield Services strongly believe that the distribution of new employment land must not just be underpinned by a purely quantitative exercise, focused around areas of new population growth. The plan process must not purely be focussed on a quantitative process to deliver employment land based on the future concentrations of population growth within small geographic zones with Stafford. It is essential that whatever growth strategy is implemented in the plan that there is a spatial distribution of employment land across the Borough which meets the needs of existing as well as future communities. The spatial distribution of existing take up rates provides an important indicator of the spatial need for future employment land.

To achieve both the quantitative employment land requirements of new population hubs, alongside serving the economic needs of the existing community and implementing a spatial dispersion policy to employment land provision, may ultimately mean that higher amounts of employment land are required to be allocated, but this approach will ensure that the employment land needs of both existing and future communities are met.

It is also an important consideration that any future Garden Community/Major Urban Community would come forward towards the end of the plan period, and the employment land within these new communities is likely to come forward in the later stages of the development due to development economics of delivering housing in the first instance. It is therefore essential that the needs of existing communities are met in the intervening period and employment land must therefore be continued to be allocated within and adjacent to the existing Recognised Industrial Estates to meet the needs of existing communities.

For these reasons it is recommended that the new plan mirrors the spatial distribution for employment land in the current plan. However, even if Stafford Borough chooses to go forward with a new Garden Community/Major Urban Extension the employment land policy should focus on both the needs of the new and existing communities and ensure that there is a spatial distribution of employment land available have regarding to past take up rates. This is the most robust mechanism to ensure that the right land is available at the right time

in the right places to support economic growth.

Part B: Your Comments

Please complete a new Part B for each representation you wish to make.

Name	Organisation Hixon Airfield Services				
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	5.N	Other	

2. Please set out your comments below

As set out previously, Hixon Airfield Services believe that the spatial distribution for new employment land should mirror the spatial distribution for new employment prescribed by the current Local Plan. Stafford Borough has a number of significant rural employment concentrations, which provide a focus for new development to support a prosperous rural economy outside of Stafford and Stone.

It is essential that the existing Recognised Industrial Estates are allowed to expand providing opportunities for new investment as well as enabling existing firms to expand during the plan period within rural areas. The expansion of Recognised Industrial Estates underpins a sustainable settlement hierarchy providing opportunities for growth in the economy in rural areas. This approach supports a sustainable settlement hierarchy by providing jobs in locations which reduces the needs to travel and ensures that sufficient land is available of the right type, in the right location and at the right time to support economic growth.

Therefore the scenario in which a new Garden Settlement comes forward and no employment land is allocated in the rest of the Borough is wholly unreasonable. This would stifle economic growth within the Borough and be harmful to the economy of Stafford Borough as there would be no long-term opportunities for businesses to start, expand and relocate in rural areas. This approach would be in direct conflict with the economic objectives of the NPPF to deliver the right type of land in the right places at the right time to support economic growth. A scenario which allocates no land within the Rest of Borough would conflict with the Core Objectives of the NPPF and would be contrary to national policy and would result in a policy which was unsound and not fit for purpose. Hixon Airfield Services would strongly object to the soundness and reasonableness of a Strategy which did not allocate any employment land within the rest of the Borough.

Hixon Airfield Services strongly believe that the distribution of new employment land must not just be underpinned by a purely quantitative exercise, focused around areas of new population growth. It is essential that whatever growth strategy is implemented in the plan that there is a spatial distribution of employment land across the Borough which meets the needs of existing as well as future communities, as the spatial distribution of existing take up rates provides an important indicator of the spatial need for future employment land.

It is also an important consideration that any future Garden Community/Major Urban Community would not come forward until towards the end of the plan period, and the employment land within these new communities is likely to come forward in the later stages of the development due to development economics of delivering housing in the first instance. It is essential that the needs of existing communities are met in the intervening period and employment land must therefore continue to be allocated within and adjacent to the existing Recognised Industrial Estates to meet the needs of existing communities.

In terms of the spatial distribution of employment land in a no garden community scenario, the plan is considering a strategy whereby between 10 and 40% of new employment land is allocated within the Rest of the Borough. Hixon Airfield Services strongly believe that at least 40% of new employment land should be allocated in the Rest of the Borough. The Plan process must have regard to the type of employment which will be delivered in geographic areas. The employment profile of business within the principle settlements in the Borough will be reflective of the economy within those areas – primarily being employment in public services, offices, retail and the service economy. Town centre uses planning policy directs these businesses to defined centre locations onto sites which are not specifically allocated for employment uses and the density of employment within these businesses is higher which means that less employment land is required in these urban locations.

By contrast, the past take up rates at Hixon Airfield Industrial Estate demonstrate that it is primarily manufacturing and storage and distribution businesses which locate into these locations, albeit it must be recognised that Hixon Airfield is currently seeking to encourage higher value businesses to the industrial estate as demonstrated by the high quality scheme (planning application reference 19/31520/REM) currently being determined by the planning authority. The distribution of employment land provision must have regard to the land requirements of businesses within Recognised Industrial Estates. Businesses in these locations provide a fundamental component of the economy and there must be adequate land available in the locations in which they choose to operate to ensure economic growth is not stifled.

For these reasons, Hixon Airfield Services strongly believe that at least 40% of new employment land should be allocated in the Rest of the Borough.

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name		Organisation Hixon Airfield Services			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	5.0	Other	
2. Please set out your comments below					
Hixon Airfield Services are promoting a 6.65 ha site for development. The site comprises a parcel of land which would form a logical extension to the defined Hixon Airfield Industrial Estate and would ‘round off’ the allocation boundary and has the potential to be brought forward as a high quality industrial estate alongside the land to the south which benefits from outline planning permission 14/20587/OUT.					

A 'Call for Sites' form has been submitted to the planning authority which fully sets out the rationale for allocating the site for development.

Part B: Your Comments

Please complete a new Part B for each representation you wish to make.

Name		Organisation Hixon Airfield Services			
1. Which part of the New Local Plan 2020-2040 "Issues and Options" consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	6.A	Other	

2. Please set out your comments below

Hixon Airfield Services consider that the three scenarios put forward in Table 6.1 under-represent potential future job growth as the 'Past Take Up Rate' scenario has been discounted without justification.

The Stafford Borough Council Economic and Housing Development Needs Assessment (EHDNA) recommends an employment land range for the Council of between 68 and 181ha between 2020 and 2040. For reasons set out in this submission, Hixon Airfield Services considered that 'Past Take Up Rate' scenario is the most robust model.

This scenario has not been included in Table 6.1 and it is considered that the Plan should include a scenario for job growth based on a continuation of past take up rates to ensure sufficient employment land is allocated to deliver economic growth.

Similarly, the distribution between business classes should have regard to past take up rates which will demonstrate the high demand for industrial and distribution floorspace within the Recognised Industrial Estates, particularly in Hixon.

Part B: Your Comments

Please complete a new Part B for each representation you wish to make.

Name		Organisation Hixon Airfield Services			
1. Which part of the New Local Plan 2020-2040 "Issues and Options" consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	6.B	Other	

2. Please set out your comments below

Hixon Airfield Services believe that to ensure economic prosperity, the Council should allocate land so that it extends existing employment premises across the Borough. This

should occur in both urban and rural areas.

The Stafford Borough Council Strategic Development Site Options Report (SDOR) prepared by Aecom recognises that Hixon Airfield is a suitable location for economic development and is an area which attracts major business with a good concentration of employment. The role and function of the Recognised Industrial Estate must be supported and encouraged in the plan process so that economic needs of existing communities continue to be met so that the employment land is available in the right places.

The established employment areas already have the supporting infrastructure to support economic growth in rural areas and are already assimilated into their local environments delivering economic growth whilst being sensitive to their surroundings. The established employment areas, including Hixon Airfield Industrial Estate, also already benefit from the key factors firms are looking for when choosing employment sites, as identified in the EHDNA including:

- physical connectivity (particularly road links);
- land for free carparking or yards for storage/parking for work vehicles; and,
- no restrictions/uncontaminated land where development is likely to be viable.

The existing Recognised Industrial Estates provide clusters of employment provision throughout the District and these important economic hubs should be supported and encouraged so that they continue to meet the economic needs of the Borough. A strategy to expand the existing Recognised Industrial Estates is considered a sustainable strategy to deliver the employment land supply whilst limiting landscape and environment impacts.

For example, Hixon Airfield Services have put forward a 6.65 ha site for development. The site comprises a parcel of land which would form a logical extension to the Hixon Airfield Industrial Estate and would ‘round off’ the allocation boundary. The site has the potential to be brought forward as a high quality industrial estate alongside the land to the south which benefits from outline planning permission 14/20587/OUT. Given the context of the site any landscape harm arising from a proposal for employment uses on this site would be negligible.

This provides an example of the benefits of a common sense approach of seeking to extend existing employment areas, which are capable of being delivered in a timely manner with negligible detrimental impacts. For these reasons it is considered that a strategy to expand existing employment areas should be the preferred option.

Part B: Your Comments				
<i>Please complete a new Part B for each representation you wish to make.</i>				
Name		Organisation Hixon Airfield Services		
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?				
Section		Paragraph		Table
Figure		Question	6.C	Other

2. Please set out your comments below					
<p>Hixon Airfield Services consider that there would be substantial economic benefits arising from the extension to Hixon Airfield Industrial Estate for the local community as well as Stafford Borough as a whole.</p> <p>The Stafford Borough Council Strategic Development Site Options Report (SDOR) prepared by Aecom recognises that Hixon Airfield is a suitable location for economic development and is an area which attracts major business with a good concentration of employment.</p> <p>This Stafford Plan should recognise and encourage the growth of successful employment locations which have been demonstrated by the market to be successful and desirable areas.</p> <p>The NPPF states that in order to build a strong and competitive economy an approach should be taken that allows areas to build on its strengths. An extension to Hixon Airfield Industrial Estate would be taking an approach which builds on the strengths of this successful employment location, and allowing an expansion of the cluster of businesses in this location would benefit both the local and wider economy.</p>					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name		Organisation Hixon Airfield Services			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	6.H	Other	
2. Please set out your comments below					
<p>Stafford Borough has a number of significant rural employment concentrations which provide a focus for new development to support a prosperous rural economy outside of Stafford and Stone. It is considered that to assist the rural economy, existing Recognised Industrial Estates such as Hixon Airfield Industrial Estate, which are well located to serve the rural economy, should be expanded to provide opportunities for new investment as well as enabling existing firms to expand during the plan period within rural areas.</p> <p>The expansion of Recognised Industrial Estates underpins a sustainable settlement hierarchy providing opportunities for growth in the economy in rural areas, by providing jobs in locations which reduces the needs to travel and ensures that sufficient land is available of the right type, in the right location and at the right time to support economic growth.</p>					

All comments should be made in writing preferably using this form and should be received by Stafford Borough Council **no later than 12 noon Tuesday 31 March 2020.**

You can view the documents online at www.staffordbc.gov.uk/new-local-plan-

Please e-mail your comments (Preferred) to: forwardplanning@staffordbc.gov.uk

or post your comments to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ

Thank you for taking the time to contribute to this consultation.

NEW LOCAL PLAN 2020-2040: ISSUES & OPTIONS
STAFFORD BOROUGH COUNCIL – PRIVACY NOTICE

How we will use your details

All representations received to the Stafford Borough New Local Plan 2020-2040 Issues & Options consultation document will be included in a schedule and made publicly available once the consultation has closed.

Stafford Borough Council will consider all representations received, using them to inform the next stage of the process for the New Local Plan 2020-2040.

Comments cannot be treated as confidential. Your personal information, such as your postal and email address will not be published and signatures will be redacted, but your name and organisation will be made available. We will only use your personal information to send you information on the New Local Plan and associated planning policy matters.

We believe you should always know what data we collect from you and how we use it, and that you should have meaningful control over both. As part of our ongoing commitment to transparency, and in relation to the new General Data Protection Regulations (May 2018), we have updated our Privacy Policy.

Stafford Borough Council are the data controller and you can find information about how we handle your personal data by visiting www.staffordbc.gov.uk/privacynotices and if you have any queries or would like to unsubscribe from receiving information then please contact forwardplanningconsultations@staffordbc.gov.uk

Our Ref: P1724/JP/kk
Date: 16th April 2020

Grosvenor House

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

Dear Sir or Madam

**Stafford Borough Local Plan 2020 – 2040
Issues and Options Consultation
Response by Muller Property Group**

We are instructed by Muller Property Group (“**MPG**”) to submit representations to the Stafford Borough Local Plan 2020 – 2040 Issues and Options Consultation. MPG have a number of interests currently within the Borough including sites in Stafford at Silkmore Lane where there is a live planning application (20/31757/FUL) for a care home along with land at Eccleshall where they have recently secured planning permission for a fully affordable housing development at The Burgage and are seeking a further phase of development to this. In light of MPG’s interests, we welcome the opportunity to comment at this time and set out our responses to the questions in the consultation document below.

**Question 3.A
Do you agree that the Vision should change?**

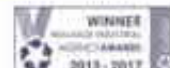
Yes, we agree that the Vision should change. Since the Local Plan was adopted in 2014, the National Planning Policy Framework (**the Framework**) has fully bedded in, and which sets out the achievement of sustainable development as the key planning objective. The Vision for Stafford should reflect this and should be amended accordingly.

**Question 3.B
Do you agree that the Vision should be shorter?**

Yes, it should be shorter. A more focussed, succinct version should be able to satisfactorily set out what the Council are aiming to achieve and in doing so will focus the reader’s mind, rather than trying to cover off all matters.

BIRMINGHAM | STOKE-ON-TRENT

NOTTINGHAM | WORCESTER



Question 3.C

Do you agree that a new Vision, whilst maintaining a commitment to growth, should more explicitly recognise the need to respond to Climate Change and its consequences?

Yes, with the ever-increasing recognition that there is a need to address Climate Change incorporating this as a central tenet of the Council's long term vision will confirm the Council's commitment to tackling it.

Question 3.D

Should the spatially-based approach to the objectives be retained? Does this spatially-based approach lead to duplication?

No, we do not consider that the spatially-based approach to objectives should be retained. The Objectives should be set for the whole Borough and then if there is a need for site or location specific objectives these should translate into site or location specific policies. As it is, there are too many objectives with a number being similar and equally applicable to the different locations they are supposed to apply to. We would suggest fewer, higher level objectives that focussed on key issues that the Council want to achieve.

Question 3.E

Is the overall number of objectives about right?

In light of our response to 3.D we consider there are too many.

Question 3.F

Should there be additional objectives to cover thematic issues? If so what should these themes be?

No. You risk getting lost in too many objectives and thereby undermining the point and focus of the Plan. Less is more.

Question 4.A

Efforts to increase energy efficiency within the borough are currently detailed in Policy N2 of the adopted Plan for Stafford Borough. However, the increasing recognition that more needs to be done to mitigate the effects of climate change suggests that measures in excess of this will now be necessary.

a) Should the new Local Plan require all developments be built to a standard in excess of the current statutory building regulations, in order to ensure that an optimum level of energy efficiency is achieved?

b) What further policies can be introduced in the Local Plan which ensures climate change mitigation measures are integrated within development across the borough?

MPG do not disagree that there is a need to address climate change and that new development has the potential to help mitigate the impact of it. However, we do not agree that the imposition of additional planning policies that require development to achieve higher environmental standards than the current system of building regulations is the correct way to do so. If the Council were to go down this route, you would effectively have duplication over control of development. As such, it is our view that the planning system should not be used to interfere with the system of building control that is in place. Building regulations are routinely amended to achieve higher environmental standards and to respond to the challenge of Climate Change and should, therefore, be left alone to do so unimpeded by dual control from the local planning authority.

Question 4.C

Should the council introduce a policy requiring large developments to source a certain percentage of their energy supply from on-site renewables?

MPG do not object in principle to the idea of large developments sourcing a proportion of their energy supply from on-site renewables, however, it is not always possible to do so and as such, a blanket requirement may not be achievable. If the Council do proceed with such a policy, MPG's preference would be that such a requirement would be sought if technically possible and where it would be financially viable to do so. If either were not possible then there should be no requirement to do so. Furthermore, as noted above, MPG consider that the focus should be on making houses more efficient thereby using less energy rather than having to generate it in the first place.

Question 4.D

Should the council allocate sites for wind energy developments in the Local Plan? If so, where should they be located?

Onshore wind generation is one of the more cost effective sources of renewable energy and as such, there is a case for the Council to allocate such sites in order to contribute to the generation of clean energy and help combat Climate Change. Whilst MPG do not have any specific view on where such sites could or should be located in principle the idea of onshore windfarm development is supported.

Question 4.E

Should the council implement a higher water standard than is specified in the statutory Building Regulations?

No. Duplication of control again and should be avoided.

Question 5.A

a) Do you consider that the existing Policy SP1 addresses the requirements of the NPPF? b) Do you consider that it is necessary to retain this policy in light of the recent change in Planning Inspectorate's view.

- a) Yes, as it replicates what is in the Framework
- b) No, we do not consider it is necessary as the Framework is a material consideration when considering planning applications so is duplication and, therefore, unnecessary.

Question 5.B

a) Which Annual Housing Requirement figure do you think will best meet Stafford Borough's future housing growth requirements? What is your reasoning for this answer? b) Should a Partial Catch Up rate allowance be incorporated? What is your reasoning for this answer?

In applying the standard method, the housing requirement would be 408 dpa, which is lower than the adopted Local Plan housing requirement of 500 dpa. The spatial portrait of the Borough that is set out in Chapter 2 of the consultation document notes that:

- The proportion of 40 – 60 year olds in the Borough is projected to decline
- There is going to be a significant increase in over 60 year olds
- The majority of housing is owner occupied and is largely detached properties
- Affordability is worsening

The four points set out above all indicate that the Council should not be looking at planning for a reduced housing requirement going forward as this would compound issues in relation to attracting working age people to the Borough whilst also making it more expensive for people to purchase a house. As such, the housing requirement going forward should be at least 500 dpa as per the adopted plan although MPG contend that there is a case for proposing a much bolder housing requirement than the adopted figure. MPG contend that either Scenario E, F or G should be pursued.

MPG agree that a Partial Catch Up rate should be applied as the headship rates contained in the Sub National Household Projections do not fully take account of household formation amongst 15 – 34 year olds which was suppressed during the last recession. As such, the application of a PCU would respond to this previously suppressed demand, resulting in a higher housing requirement thereby ensuring that the full needs of the Borough can be met.

Question 5.C

In calculating the Housing Requirement figure for the New Local Plan 2020- 2040 should a discount be applied to avoid a double counting of new dwellings between 2020 - 2031? If a discount is applied should it be for the full 6,000 new homes currently accounted for in the adopted Plan for Stafford Borough or a reduced number (please specify reasons)? Please explain your reasoning.

MPG do not consider that a discount should be applied. The Council is preparing a new Plan with a base date of 2020. The housing requirement is set from this date and therefore, what the adopted Plan is proposing between 2020 and 2031 is not relevant. The housing

requirement is based on a plan period starting in 2020 and consequently whether the Council has either a surplus or shortfall against its previous housing requirement is also not relevant. The new base date will reset the Plan and the housing requirement. The approach to discount against the future housing requirement is not one that is set out in the Framework or PPG and we would advise against pursuing such an approach as we do not consider it would be sound.

MPG are also concerned about the intention to roll forward 3,000 uncommitted dwellings on Strategic Development Locations. Notwithstanding that these dwellings are allocated in the current Plan, there is a question mark over why they have yet to deliver. Clearly, there may be a timing issue due to where we are in current Plan Period and that they may have yet to come forward, or there could be a more fundamental reason as to why they have yet to start delivering. If the latter, it would be unwise for the Council to simply roll forward the allocations without examining why the sites haven't delivered and why they consider that they will in the future. If there are question marks over their deliverability, then alternative sites should be allocated instead.

Question 5.D

- i. Do you agree with the basis for the preparation of the 2019 Settlement Hierarchy?**
- ii. Do you agree that the smaller settlements should be included in the Settlement Hierarchy?**

MPG agree with the basis for the preparation of the 2019 Settlement Hierarchy and welcome the inclusion of Eccleshall as a Large Settlement. MPG are of the view that the larger settlements within the Borough should be considered more sustainable by virtue of the level of service provision and facilities present and that as a result they should generally be the focus for development. The inclusion of smaller settlements in the Settlement Hierarchy is likely to result in a more dispersed form of development that by its very nature will be less sustainable. Whilst MPG acknowledge that some of the smaller settlements need some new development to help sustain them going forward, this should not be at the expense of directing development to the more sustainable settlements such as Eccleshall.

Question 5.F

- a) In respect of these potential spatial scenarios do you consider that all reasonable options have been proposed? If not what alternatives would you suggest?**
- b) Are there any of these spatial scenarios that you feel we should avoid? If so, why?**
- c) Which of these spatial scenarios (or a combination) do you consider is the best option? Please explain your answer**

MPG consider that all reasonable options have been proposed.

In terms of which to avoid MPG do not consider that either intensifying development in town centres or dispersing it across the Borough would deliver sufficient levels of development to meet identified needs. Similarly a new settlement would have a significant lead in time for it to

start delivering new housing and dependent on how long it takes, reliance on a new settlement to meet the Borough's housing needs could result in a five year land supply shortfall.

In terms of what combination of options we would recommend, key to the delivery of new housing is directing it to the most sustainable locations. In our view, this is around the edge of existing settlements where there are already a good range of shops, services and facilities present and where there are existing public transport routes. As such, intensification around existing settlements should be the main focus for new development. Similarly, MPG would support a degree of dispersion as smaller sites can help with delivery as they are not as infrastructure heavy. Similarly, MPG do not object in principle to the idea of a new settlement and note that if one is pursued, then a significant number of other small and medium sized sites will be needed across the Borough so that they can come forward in advance of the new settlement beginning to deliver any significant numbers.

Question 5.G

Do you consider that the consideration and utilisation of a new Garden Community / Major Urban Extension (or combination) would be helpful in determining the approach to satisfying Stafford Borough's future housing and employment land requirements? If you do think the Garden Community / Major Urban Extension approach is appropriate which of the identified options is most appropriate? Please explain your answer.

We have set out in our response to Question 5.F above that we acknowledge the role that a new settlement could play in delivering new housing for the Borough. As MPG do not have a specific interest in one of the proposed locations for a new settlement at the present time, we do not wish to comment on whether one location is preferable to another at this stage. Our concern remains that if a new settlement is pursued then the Council will need to include a sufficient buffer and to over allocate sites in order to ensure that there is no shortfall in delivery until the new settlement comes on stream. MPG contend that the best way to ensure this does not happen is to identify a range of small and medium sized settlements that are not so heavily dependent on infrastructure and which can be brought forward and delivered in a shorter timeframe, thereby making an invaluable contribution to the overall supply of housing in the Borough.

Question 5.I

Do you think that it is appropriate, in order to take the development pressure off the existing settlements in the Settlement Hierarchy, that at least one Garden Community should be incorporated into the New Local Plan? Please explain your answer.

MPG are of the view that even if the Council do pursue the option of a new settlement, this will not necessarily start delivering units in the early part of the Plan Period. As such, and to ensure continuity of supply and a five year supply of deliverable sites, then the existing settlements will still need to in the short to medium term accommodate new housing. In our view, a new settlement is only likely to help ease development pressure on existing settlements in the longer term.

Question 5.J**What combination of the four factors:**

- 1. Growth Option Scenario (A, D, E, F, G);**
- 2. Partial Catch Up**
- 3. Discount / No Discount**
- 4. No Garden Community / Garden Community**

Should Stafford Borough Council put forward as its Preferred Option at the next stage of this Plan-Making process? Please explain your answer.

In light of the responses set out above, we can summarise the suggested combination of factors that MPG would be seeking for the Council to put forward in the Preferred Option. These are:

- 1) Growth Scenario E, F or G
- 2) Apply a Partial Catch Up
- 3) Do not apply a discount
- 4) Either would be acceptable

The reasoning behind seeking Growth Scenarios E, F or G is that these are considered most likely to address the issues identified by the Council in terms of an ageing population, a reduction in the size of working age population and affordability issues. Proposing a housing requirement based on the standard method minimum requirement which is lower than the currently adopted figure does not in our view seek to boost the supply of housing in the Borough, nor would it assist with economic growth or job creation. A more positive approach is encouraged that will help boost the supply of housing.

In light of the above, the application of a Partial Catch Up rate would also assist in increasing the amount of housing that is needed, particularly as a result of hidden households not being taken account of during the previous recession.

We do not agree that a discount rate should be applied. The Council are preparing a new Plan with a new base date and therefore, the housing requirement and sites to deliver that requirement should run from the start date of the Plan and not to try and blend two plans together. There is nothing in the Framework or PPG that states such an approach would be acceptable and therefore, we conclude that it would be unsound.

Finally, MPG contend that if a new settlement is not proposed then the Council will need to identify and allocate sites around existing settlements, where there are already a good range of shops, services and facilities. Directing further growth to these will be in line with the spatial development strategy in the adopted Plan. MPG would support a continuation of this strategy, or even a blended strategy that also sought to direct some limited growth to the smaller settlements.

Conversely, if a new settlement is identified, MPG contend that due to the size of this and the need to construct essential infrastructure in order to facilitate a new settlement, there is likely to be a lag between development starting and the delivery of the first houses. To help cushion the impact of a lag in the delivery of housing, MPG contend that a wider range of smaller and medium sized sites should be allocated, which by their very nature can be delivered more quickly as they are not as dependent on the provision of new infrastructure to service them. MPG would in these circumstances be happy with whichever way the Council decided to proceed in terms of pursuing a new settlement or not.

Question 8.A

Should the council continue to encourage the development of brownfield land over greenfield land?

The Framework does not seek to prioritise the redevelopment of brownfield land over greenfield, and as such, we do not agree that the Plan should, therefore seek to encourage this. Clearly the reuse of brownfield land over greenfield land would be preferable but this is only possible where there is sufficient brownfield land available.

In seeking to identify land for development if the Council will need to balance meeting the needs of the District with identifying suitable sites in appropriate locations. Whilst the focus is likely to be on the housing, there will also be a requirement to accommodate future employment land needs.

As such, MPG contend that there will be a need to propose a mix of both brownfield and greenfield sites to meet the needs of the Borough going forward and that in doing so, there shouldn't be a focus on brownfield sites.

Question 8.B

Do you consider that the enforcement of minimum density thresholds would have a beneficial impact on development within the borough? If so do you consider:

- (i) the implementation of a blanket density threshold; or**
- (ii) a range of density thresholds reflective of the character of the local areas to be preferable?**

Why do you think this?

The Framework sets out at Chapter 11 that new development should make efficient use of land. As such, there is an underlying requirement that when undertaking development one should seek to make the most efficient use of land. As such, MPG would support the enforcement of minimum density thresholds as a target to achieve when undertaking new development. However, every site is different and whilst one can aim to achieve a set density the reality is that this is not always possible for a variety of reasons. Whilst these can be physical or environmental factors, they can also relate to the existing character and grain of development adjacent to a development site. New development should not be required to slavishly replicate the existing character of an area if this will result in an inefficient use of land,

although there again needs to be an acknowledgement that there is a transition between character areas, where a mid point in density would be appropriate. As such, rather than stating that all development must achieve a prescribed number of dwellings per hectare, MPG would rather see a common sense approach taken whereby density is considered along with other factors when deciding what is suitable for a site.

Question 8.C

Do you think that any adopted minimum density thresholds should reflect the availability of sustainable travel in the area?

The availability of sustainable travel options in a particular area is helpful when looking to develop new sites for housing as it has the potential to reduce use of the private motor car, and Council's should, therefore, look to prioritise such sites over less sustainable locations. Notwithstanding that we agree that development should be directed to such locations, we do not agree that minimum density thresholds should be applied for similar reasons to those set out in Question 8.B in that density is a blunt tool at times for assessing the suitability of development on a particular site and that some flexibility and common sense should be applied instead.

Question 8.D

Do you consider that the adoption of the Nationally Described Space Standards would work to increase housing standards, and therefore enhance the health and wellbeing of local residents in Stafford Borough?

MPG do not disagree that the Nationally Described Space Standards (NDSS) would have a positive impact on housing standards and of the people that live within new dwellings constructed to them. However, developing dwellings that accord with NDSS come with a number of challenges and again a one sized fits all approach will not work and could have the effect of actually discouraging development if houses have to be constructed to the standards.

When deciding what mix and size of houses are to be developed on a particular site the local housing market will inform what is likely to be in demand and what certain houses will sell for. Each sized unit will likely have a price ceiling. It cannot, therefore, be assumed that by building a slightly larger unit with the same number of bedrooms that this would attract a premium when it was sold. In all likelihood, the price ceiling would kick in and a larger dwelling would cost more to build, which could not be recouped through the selling price. As such, the application of NDSS could act as a disincentive to develop.

In addition to NDSS having an impact on the viability of development, developing NDSS dwellings will result in larger properties being constructed. By developing larger units, this will reduce the density of development. If houses are larger, this will also reduce the amount of open space around them resulting in the need for larger sites to accommodate the same number of units and associated open space. The end result is that if the Council do want to provide NDSS sized properties then it will need to identify additional land in order to do so.

The Framework states that the nationally described space standards should be provided where this meets a specific need, with the Framework explaining that this need is specifically built to set internal space standards being justified. The Framework requires evidence that there is a specific need that needs to be met. MPG contend that the application of NDSS should only be undertaken where there was a proven need for such houses of a specific size, and that it would be down to the Council to demonstrate that this need existed. Where it doesn't or where it cannot be demonstrated then there should be no need to develop to NDSS.

Question 8.E

In the New Local Plan should the Council

- a) Apply the Nationally Described Space Standards to all new dwellings, including the conversion of existing buildings?**
- b) Only apply the Nationally Described Space Standards to new build dwellings?**
- c) Not apply the Nationally Described Space Standards to any development?**

Please explain your answer.

In light of MPG's response to Question 8.D we contend that NDSS should only apply to new build dwellings where there is a proven need to do so and that where there is not a need then they should not apply.

Question 8.F

Do you consider that the housing mix detailed in the table above will be sufficient in meeting the needs of all members of the community?

The proposed mix set out in the table is fairly flexible with a wide range set out for each size of dwelling. It is, therefore, a helpful starting point without being overly prescriptive and would provide flexibility when making decisions about a proposed mix of units on a site.

Question 8.I

- a) Should the Council consider a policy requiring bungalows to be delivered on all major developments? If so, should there be a minimum number or proportion of such bungalows for each development?**
- b) Should the amount of land required for such bungalows be reduced by either limiting their garden size or encouraging communal/shared gardens?**
- c) Is there a need for bungalows to be delivered in both urban and rural areas?**
- d) Are there any other measures the Council should employ to meet the demand for specialist housing within the Borough of Stafford?**

If the Council did pursue a policy to require bungalows on larger development sites, MPG would welcome any relaxation in the standards that related to private garden size. Bungalows are a very inefficient use of land so anything that limits the amount of land take required to develop them would be welcomed.

MPG are less convinced that communal garden areas for bungalows would be attractive to private occupiers in that occupants of bungalows are likely going to want their own space.

In terms of measures the Council could employ, we suggest that it looks to identify specific sites for either elderly or care home facilities. Retirement living complexes are becoming more popular and could be something that the Council focussed on and identified a specific site to be developed for such a use.

It would be helpful if the Plan could provide clarity when and where care home developments would be supported by the Council so that we could avoid a situation where care home uses were competing with residential developers to secure sites. Whilst the principle of the use is essentially the same, care home uses do have different characteristics in terms of the scale and bulk of development on a site along with parking and open space requirements. The result is that not all residential sites are suitable to accommodate a care home for example. Furthermore, the provision of care homes not only meets the needs of the elderly and frail but also has the added benefit of creating jobs and employment.

We trust you take our comments into consideration as continue preparation of the Local Plan and we look forward to being notified of further stages of consultation on the Plan going forward. Should you require any clarification or have any questions about the comments above please do not hesitate to contact me.

Yours faithfully

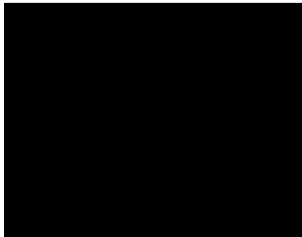


John Pearce BSc (Hons) MTPL MRTPI
Senior Planner



cc S Bourne – Muller Property Group

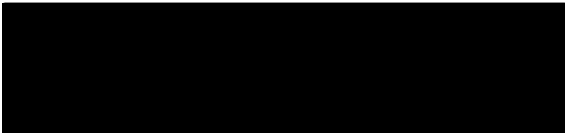
MR P W SHAW



Stafford Borough
Council
16 APR 2020
-Received

Dear Sir

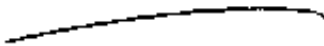
I enclose herewith representation documents towards the Stafford Borough issues and options 2020-2040. These are made on behalf of *Ason Homes Land LTD*



P W SHAW

DATE

12/04/2020



**New Stafford Borough Local Plan 2020-2040
 "Issues and Options" Consultation - Response Form**

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent's Details (if applicable)
Title		MR
First Name		PAUL
Surname		SHAW
E-mail address		
Job title (if applicable)		
Organisation (if applicable)	ARON HOMES LAND LIMITED.	
Address		
Postcode		
Telephone Number		

Thank you for taking the time to provide your comments on the "Issues and Options" document for the Stafford Borough Local Plan 2020-2040. All comments will be considered when preparing the Preferred Options for the New Local Plan.

Please return this form either by email (preferred) to: forwardplanning@staffordbc.gov.uk

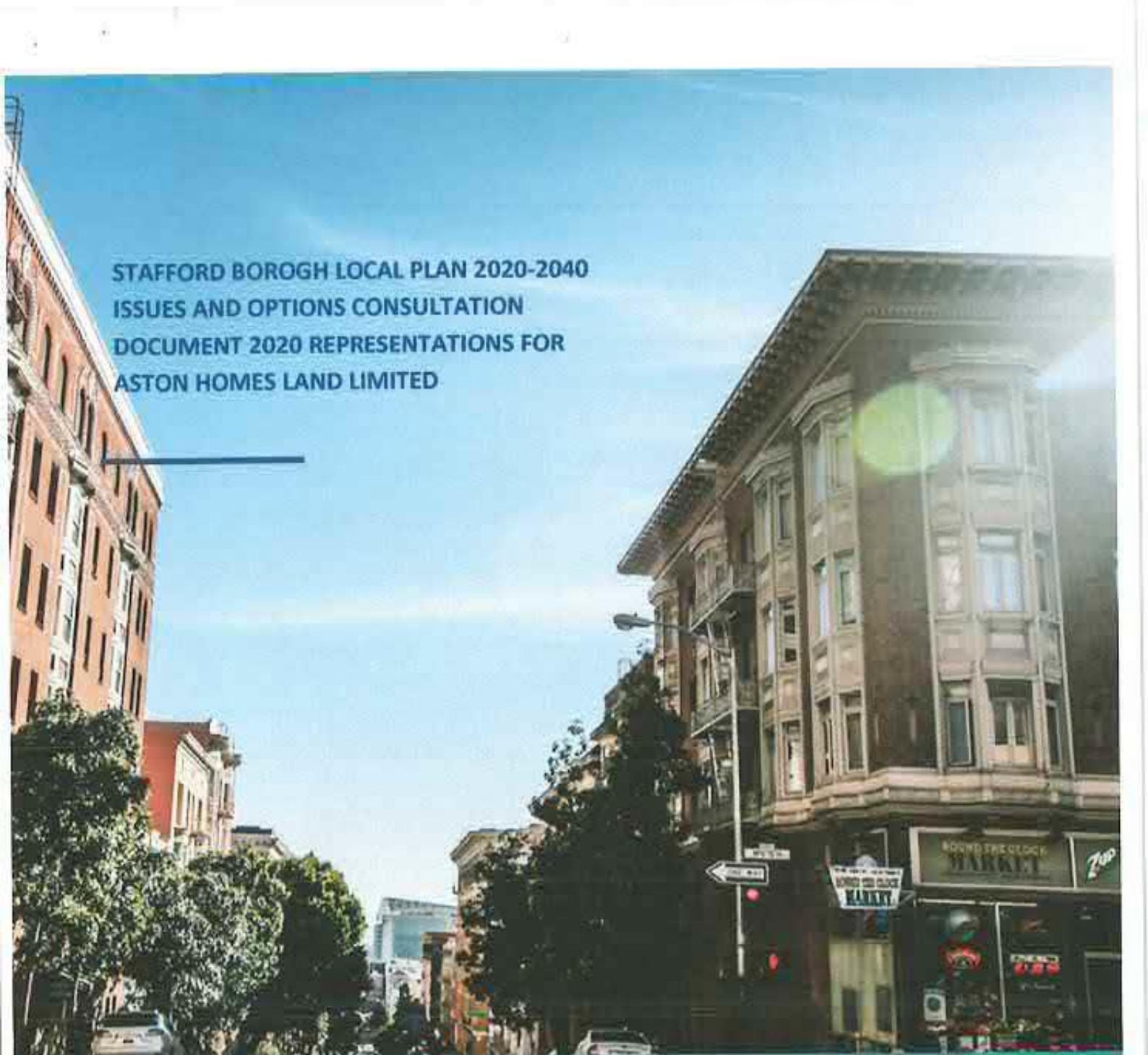
or by post to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ

Please ensure receipt by Stafford Borough Council by 12.00 noon Tuesday 31 March 2020.

For advice on how to respond to the consultation and how to fill in this form, please see the Consultation Guidance Notes on the Council's website at: www.staffordbc.gov.uk/new-local-plan or call 07800 619636 / 07800 619650.

Please note:

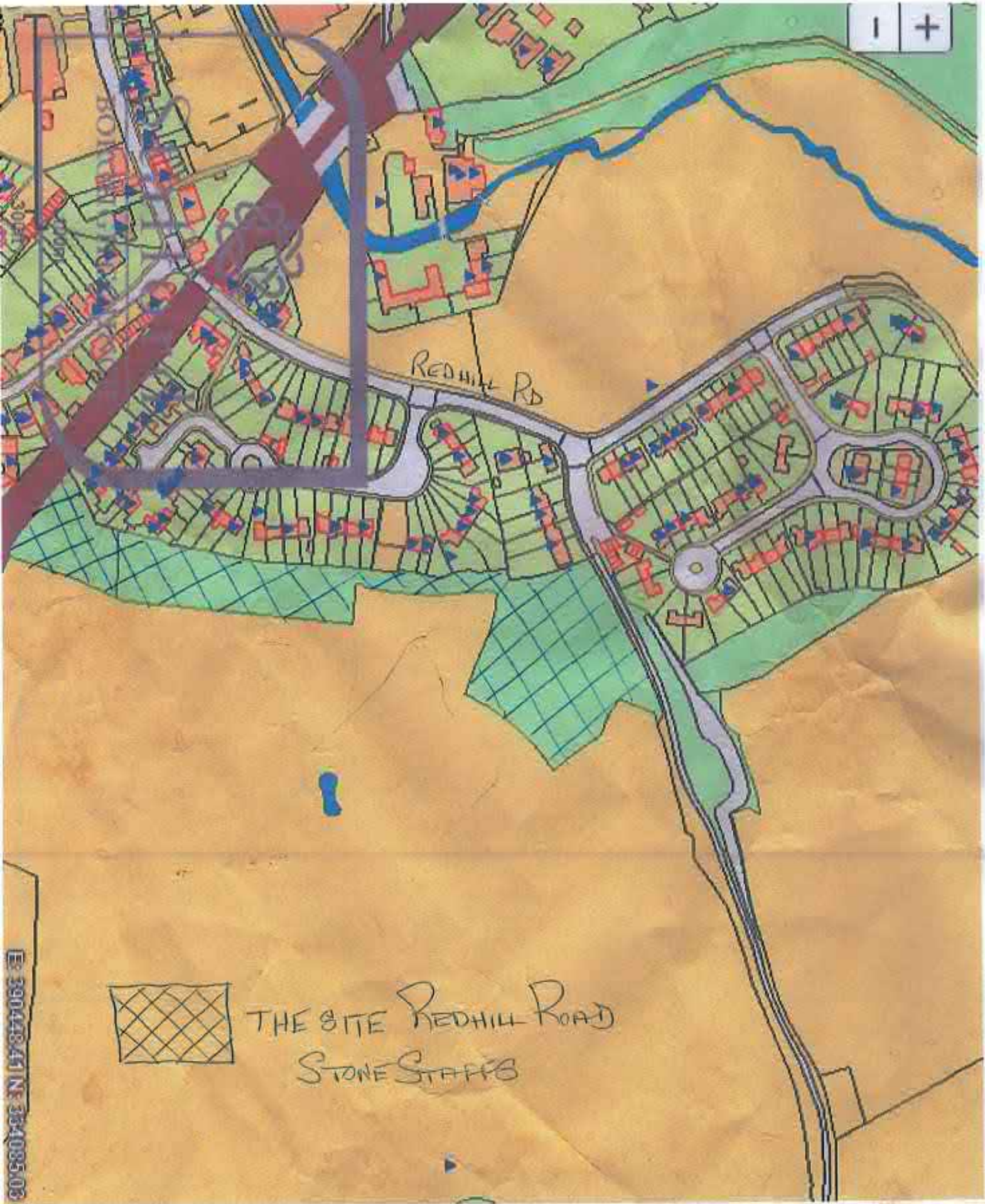
- Comments must be received by 12noon on Tuesday 31 March 2020. Late comments will be considered "not duty made" under the Regulations;



**STAFFORD BOROUGH LOCAL PLAN 2020-2040
ISSUES AND OPTIONS CONSULTATION
DOCUMENT 2020 REPRESENTATIONS FOR
ASTON HOMES LAND LIMITED**

MARCH 11 2020

P W SHAW
[REDACTED]



REDHILL RD



THE SITE REDHILL ROAD
STONE STAFFS

E 390428.41 N 324085.03

INTRODUCTION

These representations are made on behalf of Aston Homes Land Limited Michaelmas Barn Aston Lane Stone Staffs ST15OBW.

These representations are directly and indirectly related to land under option at Redhill Road Stone Staffs.

Where matters directly relate to land in question a reference will be made at the end of the relative paragraph by **AHRR**.

The land holding is reflected by the entry within the SHELAA.

”

Question 1A

The vision seems to be comprehensive apart from 1B below

Question 1 B

This element needs a much deeper scoping exercise than relying purely on the councils register. There is a much larger amount of residents who would like to build their own homes than the register shows and the basic problem arises in being able to source suitable plots and the restrictive nature of the present plan.

A new policy is needed to encourage self build opportunities everywhere in the borough from the smallest villages to the largest settlements. **AHRR**

Question 3 A

The vision needs to change and items a b d and f are ones to be followed through. Item b however needs much more depth in regard to the provision of affordable, 1st time, elderly and special needs homes. The authority need to engage more with small local providers and landowners who are prepared to provide land at the right price to make this happen and ensure suitable affordable land is bought forward for development. Item m needs reconsideration in the evidenced light of delayed strategic land development and priority should be given to rectify this to release of more sites **AHRR**

Question 3 D

- 1) Allocate more sites within areas available but no new allocations added to the present strategic sites. There needs to be a much larger spread of sites to enable more choice and flexibility in bringing development forward. **AHRR**

21 New development needs allocations across all villages regardless of size.

PWS

25 Provide affordable homes in all villages regardless of size. PWS

Question 3F

There is urgent need for a thematic new policy to specifically cover small village sites and sites adjacent to existing settlement boundaries to allow for provision of affordable and self build homes. Presumption for development should be approved providing the authority and landowners can work together to provide land to accommodate these homes thereby adding supply to a much neglected and needed sector. **AHRR**

Question 4 B and 4 D

No provision only adjacent to the motorway.

Question 5 A

Special Principle 1 should stay but needs to be applied as it should have been to available sites which can produce homes quickly and not preference the strategic sites.

Question 5 B

- a) Annual housing requirements E or G should be applied using the PCU. This will allow better growth on more sites giving choice and deliverability to encompass the EHDNA suggested strategy.
- b) The PCU needs Inclusion as it is evidently clear that the two main strategic sites have failed in their projected delivery numbers at the outset of the present plan and it is clear they will fail in this new plan. These strategic sites will fall in numbers to 2031 and need supplementing with new sites to avoid continued shortfall.

Question 5 C.

A full discount is required due to the under delivery on the main strategic sites from the trajectories given at the outset of the existing plan. The two main sites have failed in the delivery of homes and this will continue and they will not be able to catch up these numbers pre 2031.

Stafford North as at March 2019 has still 2083 plots to be built pre 2031 which collates to 2883/10 years giving 283 units per annum. The rate for the past 5 years has been 53 This shows the under delivery being dismal against the projected numbers.

Stafford West as at March 2019 shows 1911 units to be built pre 2031 which collates to 1911/10 years giving 192 units per annum. The present rate has averaged 58 per annum. This shows under delivery again being dismal against the projected numbers.

This shows the failure of large strategic sites and had the numbers over the past 5 years not been supplemented by smaller other sites the numbers would have not complied with NPPF requirements. A shift away from strategic sites is needed.

Question 5 D

The imbalance of development between the Key Service villages and Stafford/Stone clearly shows that there is a need for more diverse sites to be provided by increasing the settlement boundaries of Stafford/Stone as soon as possible. The allocation by extending the core settlement boundaries would correct the imbalance which has been created in the past 5 years.

Stafford settlement boundary specifically should be extended to take in further development sites especially in the southern corridor alongside the A 449.

This will allow sustainable development to be released which has the transport and infrastructure available now to support it. The authority must not use this new plan to add development to the existing allocated strategic sites in the North and West as this will only add to continued under delivery pre 2031.

Stone settlement boundary needs extending to provide new sites after 2031 but pre 2031 small sites on the edge of the settlement can provide useful addition.

Within the Key Villages development should be minor with any new extensions not being made available post 2031 thereby allowing Stafford/Stone to catch up. The smaller villages have however seriously lacked development attention and so every village and Hamlet below the Key Service Villages should now have some form of mixed residential development. This plan provides an opportunity for planners to provide the affordable and self build homes within these villages by liason with willing landowners to provide the available land to develop. **PWS**

There are landowners ready willing and able to provide this land. The smaller villages do not need settlement boundaries but can be decided on individual choice. The policies at present are to restrictive in relation to small village development and need relaxing as they can play a valuable part to the provision of varied development in the borough. **PWS**

Question 5 F

- a) Yes
- b) All except Intensification around the edges of the two main settlements at Stafford/Stone.
- c) Intensification of the main settlements of Stafford/Stone best uses the existing infrastructure and adds to sustainability whilst upgrading of existing facilities by way of developer contributions.

Question 5 G

No. The inclusion now of a new garden community would delay much needed housing growth and only hinder practical planning decisions pre 2031. Provision of homes from a new garden community will take a minimum of 15 years or longer will be highly controversial and will require longer transport links with its own environmental problems. New garden communities outwith existing settlements undermine the settlement viabilities and sustainability whereas using resources to enhance existing core settlements is a highly efficient way to upgrade. New garden community will create ,transport, infrastructure and environmental nightmares.

Question 5 H

- 1) YES with growth option 6 being the best option to make best use of existing facilities within the new extended Stafford/Stone settlements.

This option should EXCLUDE any extensions to the existing strategic sites.

2)

Question 5 I

No there is no need at present for a new garden community.

This proposal would be a planning nightmare and a disaster for the towns of Stafford and Stone.

The borough are trying to encourage residents to use these two centres and promoting them dally and then to take the reverse view would undermine their viability even further. A garden community site of whatever size will never provide 500 units per annum and within the borough history verifies this. No site has ever provided this number of dwellings and to assume a new centre would is to say the least misleading in its content. A garden community purporting this 500 unit per annum would never pass scrutiny with the inspector as it would be found to be unsound in its ability based on past deliveries. Proposing delivery of this scale from one outlet is ludicrous and contrary to any planning in this borough. The provision of housing must be supplied by existing sites mainly by way of extended settlements of Stafford/Stone where certainty can be assured and not "pie in the sky" delivery.

Question 5 J

Economic scenario E special option 3 with no garden community is the essential model. The provision of a garden community cannot be guaranteed whereas sites within extended settlements of Stafford/Stone can. Any pressure build up can be removed easily from Stafford/Stone by provision of extending the existing settlement boundaries. A new garden community would be a planning mistake. Settlements of below 50 dwellings do not need settlement boundaries but policies to cover them must be flexible so as to allow landowners and existing residents to provide homes without the existing moratorium of development presently existing.

Question 8 A

No There are insufficient brownfield sites within the borough and the availability of many of them to come forward is not accurately calculable for mriads of reasons. The inclusion should be a windfall calculation.

Question 8 B

NO

Question 8 C

Yes this would reflect the need and availability of the type of dwellings as a sustainable element of allocations

Question 8 D

NO this is an element that should be controlled by supply and demand.market forces and cost

Question 8E

As above at 8 D

Question 8 F

YES

Question 8 G

Smaller housing units are desperately needed throughout the borough for affordable homes,1st time buyer homes elderly persons dwellings and special needs accommodation.

The provision of these on the strategic sites has been slow, expensive and sometimes non existent. The rural small and large villages have a large unsatisfied need for this type of housing and this plan as against the present plan places a massive opportunity to provide for this. Small villages have aging populations unable to move due to lack of housing. Siblings have to move out of villages unable to afford homes. Larger homes who need to downsize cannot due to lack of housing

The solution lies with this plan. There are landowners prepared to offer land heavily discounted to help this problem and the authority need to engage with them to solve a mounting problem. The fact that there are landowners willing to help needs to be within the public domain for discussion.

Question 8 H

Yes

Question 8 I

No If provision was made as at 8 G above there would be no need for restriction.

Question 8 K

a) Yes the provision of affordable homes is essential and any target should be towards the high end at 389 dwellings per annum. This can be achieved by

- 1) Increasing the amount of homes .
- 2) Release of small sites on edge of boundaries for affordable only
- 3) Stop negotiating numbers down in section 106 agreements

b) Allocate sites by extending settlement boundaries of Stafford/Stone to bring affordable homes along earlier.

Question 8 L

No

Question 8m

Yes

Question 8 N

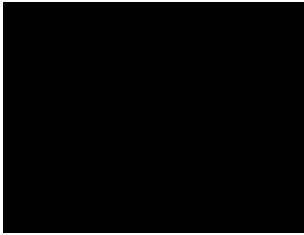
- a) No This would be too restrictive unless there were clear access points and services available however this scenario is not within a large developers business model as it is messy and difficult to police. Individual self build plots should be what it says "Individual".
- b) There should be a general policy of provision throughout the borough from within the smallest hamlet up to the large settlements and they should be proactively allowed by the borough. The smaller villages are possibly best suited to this type of development as its small does not undermine character and helps sustainability and

should be actively encouraged. Once again landowners in small villages could be encouraged to bring individual plots forward. **AHRR**

Question 8 0

- a) Without doubt YES
- b) Yes This is a stable sensible way of self build provision. The policy should be 10% or 5 units whichever is the greater but these should not be counted as rural exception sites. The policy should apply to small hamlets and villages within each parish so if there are more than one hamlet or village the 5 number should apply individually to all of them. THIS POLICY WOULD RESOLVE A MUCH NEEDED NEGLECTED SEGMENT.

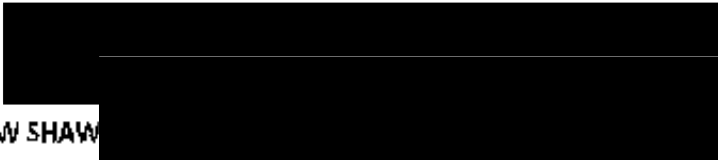
MR P W SHAW



Stafford Borough Council
16 APR 2020
-Received

Dear Sir

I enclose herewith representation documents towards the Stafford Borough Issues and options 2020-2040. These are made on behalf of *LAND AT QUEENSVILLE (STAFFORD)*



P W SHAW

DATE 12/04/2020

**New Stafford Borough Local Plan 2020-2040
 "Issues and Options" Consultation - Response Form**

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent's Details (if applicable)
Title		MR
First Name		PAUL
Surname		SHAW
E-mail address		
Job title (if applicable)		
Organisation (if applicable)	QUEENSVILLE	
Address		
Postcode		
Telephone Number		

Thank you for taking the time to provide your comments on the "Issues and Options" document for the Stafford Borough Local Plan 2020-2040. All comments will be considered when preparing the Preferred Options for the New Local Plan.

Please return this form either by email (preferred) to: forwardplanning@staffordbc.gov.uk

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Please ensure receipt by Stafford Borough Council by 12.00 noon Tuesday 31 March 2020.

For advice on how to respond to the consultation and how to fill in this form, please see the Consultation Guidance Notes on the Council's website at: www.staffordbc.gov.uk/new-local-plan or call 07800 619836 / 07800 619850.

Please note:

- Comments must be received by 12noon on Tuesday 31 March 2020. Late comments will be considered "not duly made" under the Regulations;

Site Name: Land at Queensville
Stafford, ST17 4LS

Ward: Baswich &
Forebridge

Parish: NCP

Potential Yield: 192

Greenfield or Brownfield:
Greenfield

Deliverability Summary

Available:	The site is available.
Suitable:	No; the site is adjacent to a currently recognised Local Plan settlement, but is designated as green infrastructure and is in the Flood Zone.
Achievable:	The site is achievable.
Status:	Not developable due to environmental constraints.

Description:

The site is 9.2 hectares, and is currently used for agricultural purposes.

Availability Assessment

It is not known if the necessary infrastructure is considered to be available within the locality. The site is owned by a developer, and the site is available immediately.

Suitability Assessment

The site is adjacent to the currently recognised Local Plan settlement of Stafford. The following constraints exist: green infrastructure, Historic Environment Record, landfill buffer, Flood Zone, mineral deposits. A Site of Biological Importance abuts the site on its southern boundary.

Achievability Assessment

The site is classified as CIL typology STA2, which is considered financially viable.



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**STAFFORD BOROUGH LOCAL PLAN 2020-2040
ISSUES AND OPTIONS CONSULTATION
DOCUMENT 2020 REPRESENTATIONS FOR
QUEENSVILLE**

MARCH 16 2020

P W SHAW

[REDACTED]

TEL 01784 797878



INTRODUCTION

These representations are made on behalf of QUEENSVILLE who has interest in land within Stafford Borough and as such are made on the basis of being a landowner

The representations are aimed at all general aspects and questions within the consultation and relate to Queensville land holdings where necessary and when they are will be referenced QUE at the completion of the relative paragraph,.

Question 1A

The vision seems to be comprehensive apart from 1B below

Question 1 B

This element needs a much deeper scoping exercise than relying purely on the councils register. There is a much larger amount of residents who would like to build their own homes than the register shows and the basic problem arises in being able to source suitable plots and the restrictive nature of the present plan.

A new policy is needed to encourage self build opportunities everywhere in the borough from the smallest villages to the largest settlements. QUE

Question 3 A

The vision needs to change and items a b d and f are ones to be followed through. Item b however needs much more depth in regard to the provision of affordable, 1st time, elderly and special needs homes. The authority need to engage more with small local providers and landowners who are prepared to provide land at the right price to make this happen and ensure suitable affordable land is bought forward for development. Item m needs reconsideration in the evidenced light of delayed strategic land development and priority should be given to rectify this to release of more sites. QUE

Question 3 D

- 1) Allocate more sites within areas available but no new allocations added to the present strategic sites. There needs to be a much larger spread of sites to enable more choice and flexibility in bringing development forward. QUE

21 New development needs allocations across all villages regardless of size. QUE

25 Provide affordable homes in all villages regardless of size. PWS

Question 3E

There is urgent need for a thematic new policy to specifically cover small village sites and sites adjacent to existing settlement boundaries to allow for provision of affordable and self build homes. Presumption for development should be approved providing the authority and landowners can work together to provide land to accommodate these homes thereby adding supply to a much neglected and needed sector. **QUE**

Question 4 B and 4 D

No provision only adjacent to the motorway.

Question 5 A

Special Principle 1 should stay but needs to be applied as it should have been to available sites which can produce homes quickly and not preference the strategic sites.

Question 5 B

- a) Annual housing requirements E or G should be applied using the PCU. This will allow better growth on more sites giving choice and deliverability to encompass the EHDNA suggested strategy.
- b) The PCU needs inclusion as it is evidently clear that the two main strategic sites have failed in their projected delivery numbers at the outset of the present plan and it is clear they will fail in this new plan. These strategic sites will fail in numbers to 2031 and need supplementing with new sites to avoid continued shortfall.

Question 5 C

A full discount is required due to the under delivery on the main strategic sites from the trajectories given at the outset of the existing plan. The two main sites have failed in the delivery of homes and this will continue and they will not be able to catch up these numbers pre 2031.

Stafford North as at March 2019 has still 2083 plots to be built pre 2031 which collates to 2883/10 years giving 283 units per annum. The rate for the past 5 years has been 53 This shows the under delivery being dismal against the projected numbers.

Stafford West as at March 2019 shows 1911 units to be built pre 2031 which collates to 1911/10 years giving 192 units per annum. The present rate has averaged 58 per annum. This shows under delivery again being dismal against the projected numbers.

This shows the failure of large strategic sites and had the numbers over the past 5 years not been supplemented by smaller other sites the numbers would have not complied with NPPF requirements. A shift away from strategic sites is needed.

Question 5 D

The imbalance of development between the Key Service villages and Stafford/Stone clearly shows that there is a need for more diverse sites to be provided by increasing the settlement boundaries of Stafford/Stone as soon as possible. The allocation by extending the core settlement boundaries would correct the imbalance which has been created in the past 5 years.

Stafford settlement boundary specifically should be extended to take in further development sites especially in the southern corridor alongside the A 449.

This will allow sustainable development to be released which has the transport and infrastructure available now to support it. The authority must not use this new plan to add development to the existing allocated strategic sites in the North and West as this will only add to continued under delivery pre 2031.

Stone settlement boundary needs extending to provide new sites after 2031 but pre 2031 small sites on the edge of the settlement can provide useful addition.

Within the Key Villages development should be minor with any new extensions not being made available post 2031 thereby allowing Stafford/Stone to catch up. The smaller villages have however seriously lacked development attention and so every village and Hamlet below the Key Service Villages should now have some form of mixed residential development. This plan provides an opportunity for planners to provide the affordable and self build homes within these villages by liaison with willing landowners to provide the available land to develop. **QUE**

There are landowners ready willing and able to provide this land. The smaller villages do not need settlement boundaries but can be decided on individual choice. The policies at present are too restrictive in relation to small village development and need relaxing as they can play a valuable part to the provision of varied development in the borough. **QUE**

Question 5 F

- a) Yes
- b) All except intensification around the edges of the two main settlements at Stafford/Stone.
- c) Intensification of the main settlements of Stafford/Stone best uses the existing infrastructure and adds to sustainability whilst upgrading of existing facilities by way of developer contributions.

Question 5 G

No. The inclusion now of a new garden community would delay much needed housing growth and only hinder practical planning decisions pre 2031. Provision of homes from a new garden community will take a minimum of 15 years or longer will be highly controversial and will require longer transport links with its own environmental problems. New garden communities outwith existing settlements undermine the settlement viabilities and sustainability whereas using resources to enhance existing core settlements is a highly efficient way to upgrade. New garden community will create transport, infrastructure and environmental nightmares.

Question 5 H

- 1) YES with growth option 6 being the best option to make best use of existing facilities within the new extended Stafford/Stone settlements.

This option should EXCLUDE any extensions to the existing strategic sites.

2)

Question 5 I

No there is no need at present for a new garden community. This proposal would be a planning nightmare and a disaster for the towns of Stafford and Stone.

The borough are trying to encourage residents to use these two centres and promoting them daily and then to take the reverse view would undermine their viability even further. A garden community site of whatever size will never provide 500 units per annum and within the borough history verifies this. No site has ever provided this number of dwellings and to assume a new centre would be to say the least misleading in its content. A garden community purporting this 500 unit per annum would never pass scrutiny with the Inspector as it would be found to be unsound in its ability based on past deliveries. Proposing delivery of this scale from one outlet is ludicrous and contrary to any planning in this borough. The provision of housing must be supplied by existing sites mainly by way of extended settlements of Stafford/Stone where certainty can be assured and not "pie in the sky" delivery.

Question 5 J

Economic scenario E special option 3 with no garden community is the essential model. The provision of a garden community cannot be guaranteed whereas sites within extended settlements of Stafford/Stone can. Any pressure build up can be removed easily from Stafford/Stone by provision of extending the existing settlement boundaries. A new garden community would be a planning mistake. Settlements of below 50 dwellings do not need settlement boundaries but policies to cover them must be flexible so as to allow landowners and existing residents to provide homes without the existing moratorium of development presently existing.

Question 8 A

No There are insufficient brownfield sites within the borough and the availability of many of them to come forward is not accurately calculable for miriads of reasons. The inclusion should be a windfall calculation.

Question 8 B

NO

Question 8 C

Yes this would reflect the need and availability of the type of dwellings as a sustainable element of allocations

Question 8 D

NO this is an element that should be controlled by supply and demand, market forces and cost

Question 8 E

As above at 8 D

Question 8 F

YES

Question 8 G

Smaller housing units are desperately needed throughout the borough for affordable homes, 1st time buyer homes elderly persons dwellings and special needs accommodation.

The provision of these on the strategic sites has been slow, expensive and sometimes non-existent. The rural small and large villages have a large unsatisfied need for this type of housing and this plan as against the present plan places a massive opportunity to provide for this. Small villages have aging populations unable to move due to lack of housing. Siblings have to move out of villages unable to afford homes. Larger homes who need to downsize cannot due to lack of housing

The solution lies with this plan. There are landowners prepared to offer land heavily discounted to help this problem and the authority need to engage with them to solve a mounting problem. The fact that there are landowners willing to help needs to be within the public domain for discussion.

Question 8 H

Yes

Question 8 I

No if provision was made as at 8 G above there would be no need for restriction.

Question 8 k

a) Yes the provision of affordable homes is essential and any target should be towards the high end at 389 dwellings per annum. This can be achieved by

- 1) Increasing the amount of homes .
 - 2) Release of small sites on edge of boundaries for affordable only
 - 3) Stop negotiating numbers down in section 106 agreements
- b) Allocate sites by extending settlement boundaries of Stafford/Stone to bring affordable homes along earlier.

Question 8 l

No

Question 8m

Yes

Question 8 N

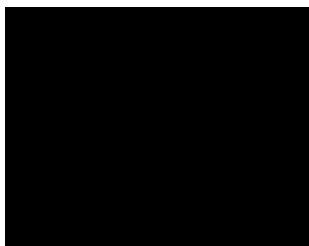
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should be actively encouraged. Once again landowners in small villages could be encouraged to bring individual plots forward. **QUE**

Question 8 0

- a) Without doubt a resounding YES
- b) Yes This is a stable sensible way of self build provision. The policy should be 10% or 5 units whichever is the greater but these should not be counted as rural exception sites. The policy should apply to small hamlets and villages within each parish so if there are more than one hamlet or village the 5 number should apply individually to all of them. THIS POLICY WOULD RESOLVE A MUCH NEEDED NEGLECTED SEGMENT.

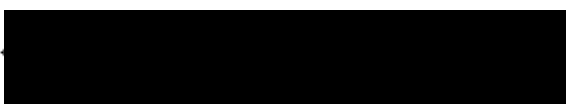
MR P W SHAW



Stafford Borough Council
16 APR 2020
-Received

Dear Sir

I enclose herewith representation documents towards the Stafford Borough issues and options 2020-2040. These are made on behalf of *MILWOOD LAND (STAFFORD) LTD*



~~P W SHAW~~

DATE *12/04/2020*

**New Stafford Borough Local Plan 2020-2040
 "Issues and Options" Consultation - Response Form**

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent's Details (if applicable)
Title	—	MR
First Name	—	PAUL
Surname	—	STEAN
E-mail address	—	
Job title (if applicable)	—	—
Organisation (if applicable)	MILWOOD LAND (STAFFORD) LIMITED	—
Address	—	
Postcode	—	
Telephone Number	—	

Thank you for taking the time to provide your comments on the "Issues and Options" document for the Stafford Borough Local Plan 2020-2040. All comments will be considered when preparing the Preferred Options for the New Local Plan.

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Please note:

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Site Name: Land at Ash Flats Lane/Moss Pit, ST18 9BP

Ward: Manor

Parish: Stafford MB

Potential Yield: 314

Greenfield or Brownfield:
Greenfield

Deliverability Summary

Available:	The site is available.
Suitable:	The site is adjacent to a sustainable settlement identified in the adopted Local Plan.
Achievable:	The site is achievable.
Status:	The area of the site not in the flood zone is potentially developable based on the compliance with Policy C5 of the Local Plan and Paragraph 71 of the NPPF.

Description:

The site is 14.9 hectares, and is currently a greenfield site.

Availability Assessment

The necessary infrastructure is considered to be available within the locality, but the provision of infrastructure to the site will need to be confirmed with the relevant utility companies. The site currently has multiple owners, and the site is available immediately.

Suitability Assessment

The site is adjacent to the currently recognised Local Plan settlement of Stafford. However, some of the site falls outside of Stafford Borough boundary. The following constraints exist: Tree Preservation Order, Public Right of Way, Historic Environment Record, Flood Zone, mineral deposits.

Achievability Assessment

The site is classified as CIL typology STA1, which is considered financially viable.



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**STAFFORD BOROUGH LOCAL PLAN 2020-2040
ISSUES AND OPTIONS CONSULTATION
DOCUMENT 2020 REPRESENTATIONS FOR
MILWOOD LAND STAFFORD LIMITED**

MARCH 16 2020

P W SHAW

TEL 0122497879



INTRODUCTION

These representations are made on behalf of Milwood Land Stafford Limited who has interest in land within Stafford Borough and as such are made on the basis of being a landowner

The representations are aimed at all general aspects and questions within the consultation and relate to Milwood land holdings where necessary and when they are will be referenced MIL at the completion of the relative paragraph,

Question 1A

The vision seems to be comprehensive apart from 1B below

Question 1 B

This element needs a much deeper scoping exercise than relying purely on the councils register. There is a much larger amount of residents who would like to build their own homes than the register shows and the basic problem arises in being able to source suitable plots and the restrictive nature of the present plan.

A new policy is needed to encourage self build opportunities everywhere in the borough from the smallest villages to the largest settlements. **MIL**

Question 3 A

The vision needs to change and items a, b, d and f are ones to be followed through. Item b however needs much more depth in regard to the provision of affordable, 1st time, elderly and special needs homes. The authority need to engage more with small local providers and landowners who are prepared to provide land at the right price to make this happen and ensure suitable affordable land is bought forward for development. Item m needs reconsideration in the evidenced light of delayed strategic land development and priority should be given to rectify this to release of more sites. **MIL**

Question 3 D

- 1) Allocate more sites within areas available but no new allocations added to the present strategic sites. There needs to be a much larger spread of sites to enable more choice and flexibility in bringing development forward. **QUE**

21 New development needs allocations across all villages regardless of size. **MIL**

25 Provide affordable homes in all villages regardless of size.

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There is urgent need for a thematic new policy to specifically cover small village sites and sites adjacent to existing settlement boundaries to allow for provision of affordable and self build homes. Presumption for development should be approved providing the authority and landowners can work together to provide land to accommodate these homes thereby adding supply to a much neglected and needed sector. **MIL**

Question 4 B and 4 D

No provision only adjacent to the motorway.

Question 5 A

Special Principle 1 should stay but needs to be applied as it should have been to available sites which can produce homes quickly and not preference the strategic sites. **MIL**

Question 5 B

- a) Annual housing requirements E or G should be applied using the PCU. This will allow better growth on more sites giving choice and deliverability to encompass the EHDNA suggested strategy. **MIL**
- b) The PCU needs inclusion as it is evidently clear that the two main strategic sites have failed in their projected delivery numbers at the outset of the present plan and it is clear they will fail in this new plan. These strategic sites will fail in numbers to 2031 and need supplementing with new sites to avoid continued shortfall. **MIL**

Question 5 C.

A full discount is required due to the under delivery on the main strategic sites from the trajectories given at the outset of the existing plan. The two main sites have failed in the delivery of homes and this will continue and they will not be able to catch up these numbers pre 2031. **MIL**

Stafford North as at March 2019 has still 2083 plots to be built pre 2031 which collates to 2883/10 years giving 283 units per annum. The rate for the past 5 years has been 53 This shows the under delivery being dismal against the projected numbers. **MIL**

Stafford West as at March 2019 shows 1911 units to be built pre 2031 which collates to 1911/10 years giving 192 units per annum. The present rate has averaged 58 per annum. This shows under delivery again being dismal against the projected numbers. **MIL**

This shows the failure of large strategic sites and had the numbers over the past 5 years not been supplemented by smaller other sites the numbers would have not complied with NPPF requirements. A shift away from strategic sites is needed. **MIL**

Question 5 D

The imbalance of development between the Key Service villages and Stafford/Stone clearly shows that there is a need for more diverse sites to be provided by increasing the settlement boundaries of Stafford/Stone as soon as possible. The allocation by extending the core settlement boundaries would correct the imbalance which has been created in the past 5 years. **MIL**

Stafford settlement boundary specifically should be extended to take in further development sites especially in the southern corridor alongside the A 449. **MIL**

This will allow sustainable development to be released which has the transport and infrastructure available now to support it. The authority must not use this new plan to add development to the existing allocated strategic sites in the North and West as this will only add to continued under delivery pre 2031. **MIL**

Stone settlement boundary needs extending to provide new sites after 2031 but pre 2031 small sites on the edge of the settlement can provide useful addition.

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There are landowners ready willing and able to provide this land. The smaller villages do not need settlement boundaries but can be decided on individual choice. The policies at present are too restrictive in relation to small village development and need relaxing as they can play a valuable part to the provision of varied development in the borough. **MIL**

Question 5 F

- a) Yes
- b) All except intensification around the edges of the two main settlements at Stafford/Stone. **MIL**
- c) Intensification of the main settlements of Stafford/Stone best uses the existing infrastructure and adds to sustainability whilst upgrading of existing facilities by way of developer contributions. **MIL**

Question 5 G

No. The inclusion now of a new garden community would delay much needed housing growth and only hinder practical planning decisions pre 2031. Provision of homes from a new garden community will take a minimum of 15 years or longer will be highly controversial and will require longer transport links with its own environmental problems. New garden communities outwith existing settlements undermine the settlement viabilities and sustainability whereas using resources to enhance existing core settlements is a highly efficient way to upgrade. New garden community will create transport, infrastructure and environmental nightmares. **MIL**

Question 5 H

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This option should EXCLUDE any extensions to the existing strategic sites. MIL

2)

Question 5 I

No there is no need at present for a new garden community. This proposal would be a planning nightmare and a disaster for the towns of Stafford and Stone.

The borough are trying to encourage residents to use these two centres and promoting them daily and then to take the reverse view would undermine their viability even further. A garden community site of whatever size will never provide 500 units per annum and within the borough history verifies this. No site has ever provided this number of dwellings and to assume a new centre would be to say the least misleading in its content. A garden community purporting this 500 unit per annum would never pass scrutiny with the inspector as it would be found to be unsound in its ability based on past deliveries. Proposing delivery of this scale from one outlet is ludicrous and contrary to any planning in this borough. The provision of housing must be supplied by existing sites mainly by way of extended settlements of Stafford/Stone where certainty can be assured and not "pie in the sky" delivery. MIL

Question 5 J

Economic scenario E special option 3 with no garden community is the essential model. The provision of a garden community cannot be guaranteed whereas sites within extended settlements of Stafford/Stone can. Any pressure build up can be removed easily from Stafford/Stone by provision of extending the existing settlement boundaries. A new garden community would be a planning mistake. Settlements of below 50 dwellings do not need settlement boundaries but policies to cover them must be flexible so as to allow landowners and existing residents to provide homes without the existing moratorium of development presently existing. MIL

Question 8 A

No There are insufficient brownfield sites within the borough and the availability of many of them to come forward is not accurately calculable

Question 8 H

Yes

Question 8 I

No if provision was made as at 8 G above there would be no need for restriction.

Question 8 k

a) Yes the provision of affordable homes is essential and any target should be towards the high end at 389 dwellings per annum. This can be achieved by

- 1) Increasing the amount of homes .
- 2) Release of small sites on edge of boundaries for affordable only
- 3) Stop negotiating numbers down in section 106 agreements

b) Allocate sites by extending settlement boundaries of Stafford/Stone to bring affordable homes along earlier.

Question 8 l

No

Question 8m

Yes

Question 8 N

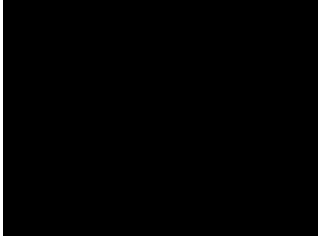
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Question 8 0

- a) Without doubt a resounding YES
- b) Yes This is a stable sensible way of self build provision. The policy should be 10% or 5 units whichever is the greater but these should not be counted as rural exception sites. The policy should apply to small hamlets and villages within each parish so if there are more than one hamlet or village the 5 number should apply individually to all of them. THIS POLICY WOULD RESOLVE A MUCH NEEDED NEGLECTED SEGMENT.

Stafford Borough
Council
16 APR 2020
-Received

MR P W SHAW



Dear Sir

I enclose herewith representation documents towards the Stafford Borough issues and options 2020-2040. These are made on behalf of MR N. ASH



~~P W SHAW~~

DATE

12/04/2020

**New Stafford Borough Local Plan 2020-2040
 "Issues and Options" Consultation - Response Form**

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent's Details (if applicable)
Title	MR	MR
First Name	NICHOLAS	PAUL
Surname	FRITH	SHAW
E-mail address		
Job title (if applicable)		
Organisation (if applicable)		
Address		
Postcode		
Telephone Number		

Thank you for taking the time to provide your comments on the "Issues and Options" document for the Stafford Borough Local Plan 2020-2040. All comments will be considered when preparing the Preferred Options for the New Local Plan.

Please return this form either by email (preferred) to: forwardplanning@staffordbc.gov.uk

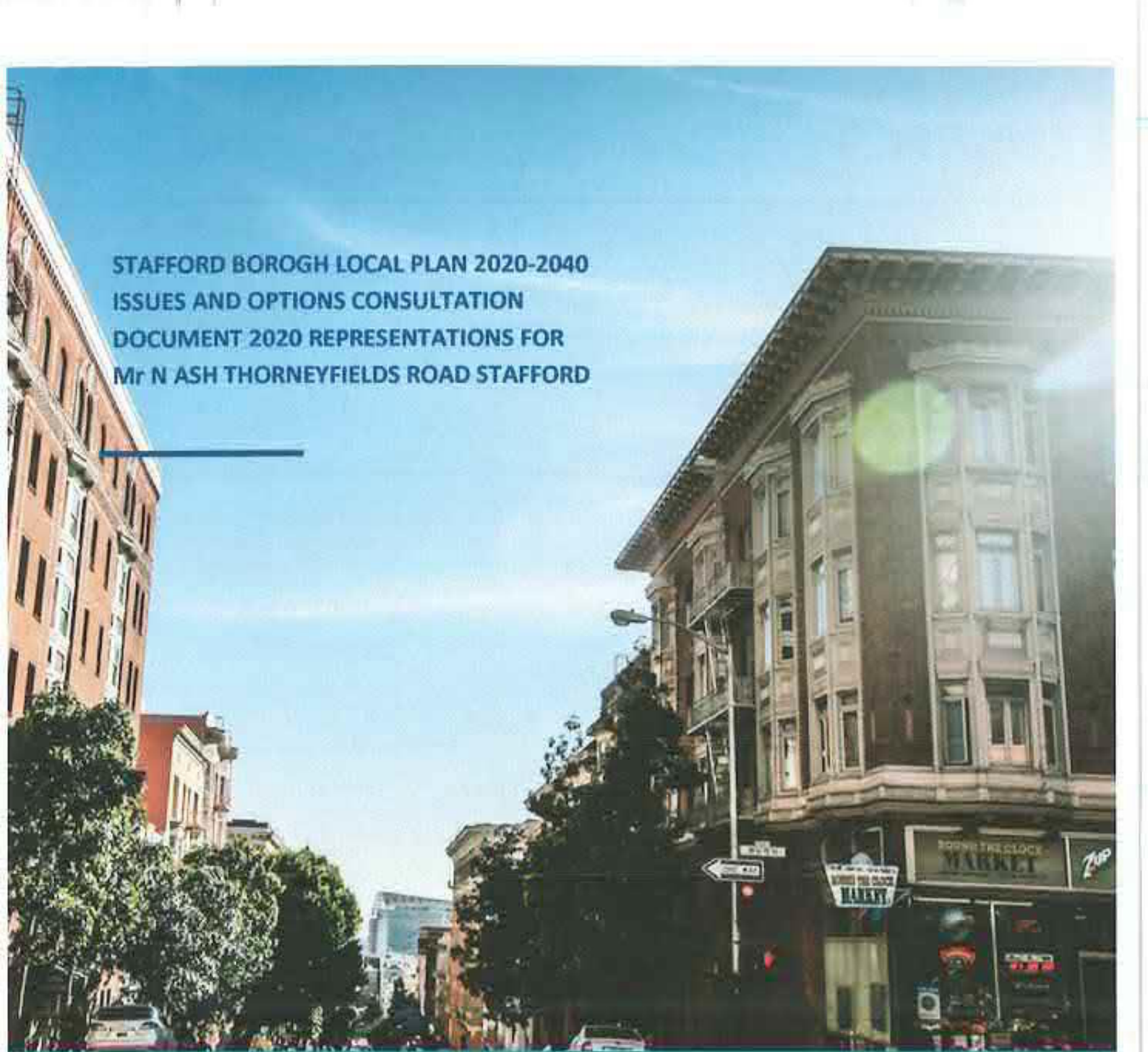
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Please note:

- Comments must be received by 12noon on Tuesday 31 March 2020. Late comments will be considered "not duly made" under the Regulations;



**STAFFORD BOROUGH LOCAL PLAN 2020-2040
ISSUES AND OPTIONS CONSULTATION
DOCUMENT 2020 REPRESENTATIONS FOR
Mr N ASH THORNEYFIELDS ROAD STAFFORD**

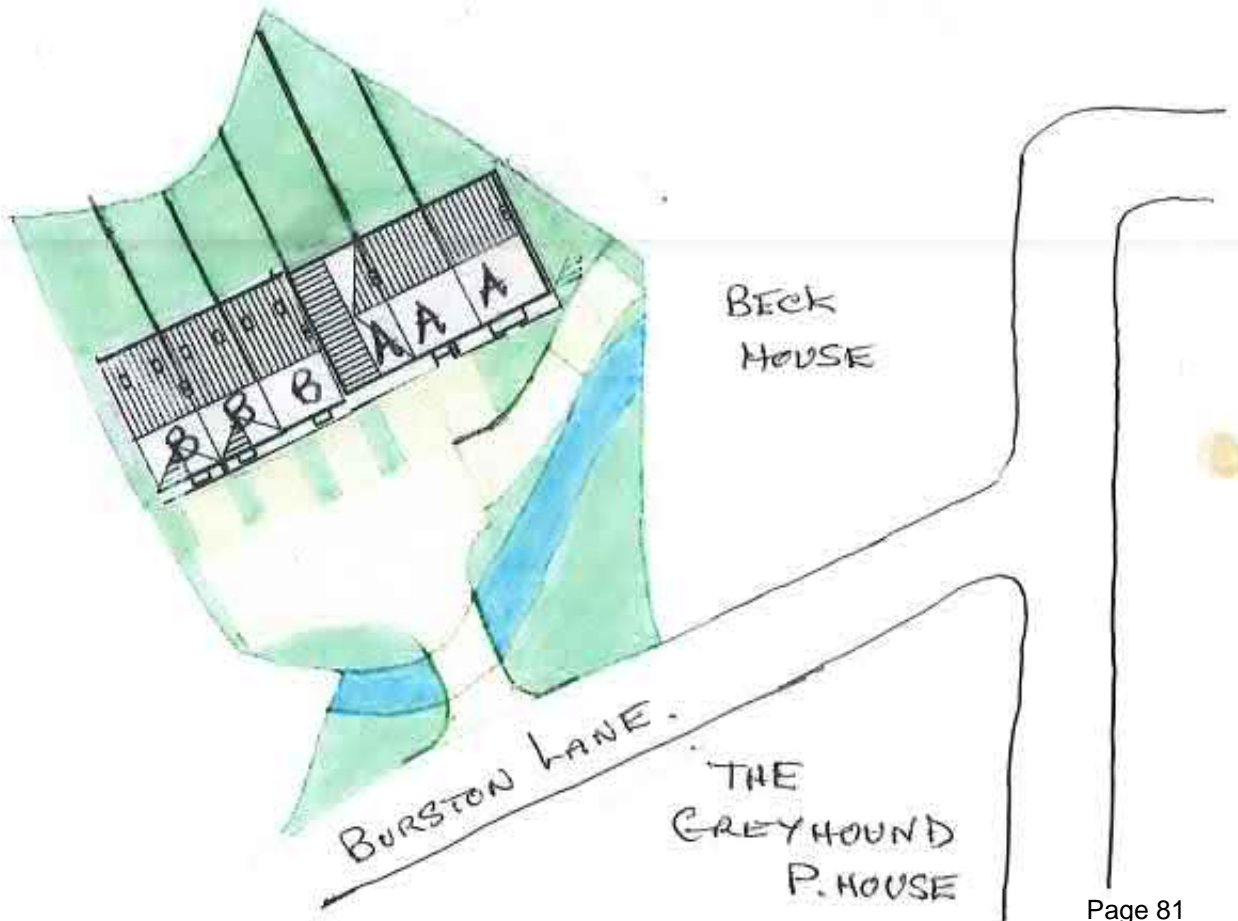
MARCH 11 2020

P W SHAW
[REDACTED]

Burston Lane, Burston, Stafford

Proposed Scheme for Six Affordable Housing Dwellings

Approx Scale 1:500



INTRODUCTION

These representations are made on behalf of Mr N Ash Thorneyfields Road Stafford

These representations are directly related to land under option by Mr Ash.

The land ownership is at Burston Lane Burston Stone Stafford and is available for affordable Home or Self Build Plots.

Question 1A

The vision seems to be comprehensive apart from 1B below

Question 1 B

This element needs a much deeper scoping exercise than relying purely on the councils register. There is a much larger amount of residents who would like to build their own homes than the register shows and the basic problem arises in being able to source suitable plots and the restrictive nature of the present plan.

A new policy is needed to encourage self build opportunities everywhere in the borough from the smallest villages to the largest settlements.

Question 3 A

The vision needs to change and items a, b, d and f are ones to be followed through. Item b however needs much more depth in regard to the provision of affordable, 1st time, elderly and special needs homes. The authority needs to engage more with small local providers and landowners who are prepared to provide land at the right price to make this happen and ensure suitable affordable land is bought forward for development. Item m needs reconsideration in the evidenced light of delayed strategic land development and priority should be given to rectify this to release of more sites.

Question 3 D

- 1) Allocate more sites within areas available but no new allocations added to the present strategic sites. There needs to be a much larger spread of sites to enable more choice and flexibility in bringing development forward.
- 21 New development needs allocations across all villages regardless of size.
- 25 Provide affordable homes in all villages regardless of size. PWS

Question 5 C.

A full discount is required due to the under delivery on the main strategic sites from the trajectories given at the outset of the existing plan. The two main sites have failed in the delivery of homes and this will continue and they will not be able to catch up these numbers pre 2031.

Stafford North as at March 2019 has still 2083 plots to be built pre 2031 which collates to 2883/10 years giving 288 units per annum. The rate for the past 5 years has been 53 This shows the under delivery being dismal against the projected numbers.

Stafford West as at March 2019 shows 1911 units to be built pre 2031 which collates to 1911/10 years giving 191 units per annum. The present rate has averaged 58 per annum. This shows under delivery again being dismal against the projected numbers.

This shows the failure of large strategic sites and had the numbers over the past 5 years not been supplemented by smaller other sites the numbers would have not complied with NPPF requirements. A shift away from strategic sites is needed.

Question 5 D

The imbalance of development between the Key Service villages and Stafford/Stone clearly shows that there is a need for more diverse sites to be provided by increasing the settlement boundaries of Stafford/Stone as soon as possible. The allocation by extending the core settlement boundaries would correct the imbalance which has been created in the past 5 years.

Stafford settlement boundary specifically should be extended to take in further development sites especially in the southern corridor alongside the A 449.

This will allow sustainable development to be released which has the transport and infrastructure available now to support it. The authority must not use this new plan to add development to the existing allocated strategic sites in the North and West as this will only add to continued under delivery pre 2031.

Stone settlement boundary needs extending to provide new sites after 2031 but pre 2031 small sites on the edge of the settlement can provide useful addition.

Within the Key Villages development should be minor with any new extensions not being made available post 2031 thereby allowing Stafford/Stone to catch up. The smaller villages have however seriously lacked development attention and so every village and Hamlet below the Key Service Villages should now have some form of mixed residential development. This plan provides an opportunity for planners to provide the affordable and self build homes within these villages by liaison with willing landowners to provide the available land to develop.

There are landowners ready willing and able to provide this land. The smaller villages do not need settlement boundaries but can be decided on individual choice. The policies at present are too restrictive in relation to small village development and need relaxing as they can play a valuable part to the provision of varied development in the borough.

Question 5 F

- a) Yes
- b) All except intensification around the edges of the two main settlements at Stafford/Stone.
- c) Intensification of the main settlements of Stafford/Stone best uses the existing infrastructure and adds to sustainability whilst upgrading of existing facilities by way of developer contributions.

Question 5 G

No. The inclusion now of a new garden community would delay much needed housing growth and only hinder practical planning decisions pre 2031. Provision of homes from a new garden community will take a minimum of 15 years or longer will be highly controversial and will require longer transport links with its own environmental problems. New garden communities outwith existing settlements undermine the settlement viabilities and sustainability whereas using resources to enhance existing core settlements is a highly efficient way to upgrade. New garden community will create transport, infrastructure and environmental nightmares.

Question 5 H

- 1) YES with growth option 6 being the best option to make best use of existing facilities within the new extended Stafford/Stone settlements.

This option should EXCLUDE any extensions to the existing strategic sites.

2)

Question 5 I

No there is no need at present for a new garden community.

This proposal would be a planning nightmare and a disaster for the towns of Stafford and Stone.

The borough are trying to encourage residents to use these two centres and promoting them daily and then to take the reverse view would undermine their viability even further. A garden community site of whatever size will never provide 500 units per annum and within the borough history verifies this. No site has ever provided this number of dwellings and to assume a new centre would is to say the least misleading in its content. A garden community purporting this 500 unit per annum would never pass scrutiny with the inspector as it would be found to be unsound in its ability based on past deliveries. Proposing delivery of this scale from one outlet is ludicrous and contrary to any planning in this borough. The provision of housing must be supplied by existing sites mainly by way of extended settlements of Stafford/Stone where certainty can be assured and not "ple in the sky" delivery.

Question 5 J

Economic scenario E special option 3 with no garden community is the essential model. The provision of a garden community cannot be guaranteed whereas sites within extended settlements of Stafford/Stone can. Any pressure build up can be removed easily from Stafford/Stone by provision of extending the existing settlement boundaries. A new garden community would be a planning mistake. Settlements of below 50 dwellings do not need settlement boundaries but policies to cover them must be flexible so as to allow landowners and existing residents to provide homes without the existing moratorium of development presently existing.

Question 8 A

No There are insufficient brownfield sites within the borough and the availability of many of them to come forward is not accurately calculable for a myriad of reasons. The inclusion should be a windfall calculation.

Question 8 B

NO

Question 8 C

Yes this would reflect the need and availability of the type of dwellings as a sustainable element of allocations

Question 8 D

NO this is an element that should be controlled by supply and demand, market forces and cost

Question 8 E

As above at 8 D

Question 8 F

YES

Question 8 G

Smaller housing units are desperately needed throughout the borough for affordable homes, 1st time buyer homes elderly persons dwellings and special needs accommodation.

The provision of these on the strategic sites has been slow, expensive and sometimes non-existent. The rural small and large villages have a large unsatisfied need for this type of housing and this plan as against the present plan places a massive opportunity to provide for this. Small villages have aging populations unable to move due to lack of housing. Siblings have to move out of villages unable to afford homes. Larger homes who need to downsize cannot due to lack of housing

The solution lies with this plan. There are landowners prepared to offer land heavily discounted to help this problem and the authority need to engage with them to solve a mounting problem. The fact that there are landowners willing to help needs to be within the public domain for discussion.

Question 8 H

Yes

Question 8 I

No if provision was made as at 8 G above there would be no need for restriction.

Question 8 K

a) Yes the provision of affordable homes is essential and any target should be towards the high end at 389 dwellings per annum. This can be achieved by

1) Increasing the amount of homes .

2) Release of small sites on edge of boundaries for affordable only

3) Stop negotiating numbers down in section 106 agreements

b) Allocate sites by extending settlement boundaries of Stafford/Stone to bring affordable homes along earlier.

Question 8 L

No

Question 8m

Yes

Question 8 N

a) No This would be too restrictive unless there were clear access points and services available however this scenario is not within a large developers business model as it is messy and difficult to police. Individual self build plots should be what it says "individual".

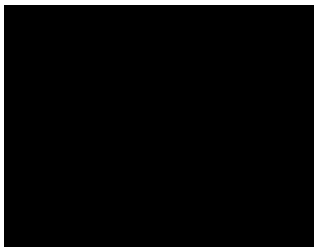
b) There should be a general policy of provision throughout the borough from within the smallest hamlet up to the large settlements and they should be proactively allowed by the borough. The smaller villages are possibly best suited to this type of development as its small does not undermine character and helps sustainability and

should be actively encouraged. Once again landowners in small villages could be encouraged to bring individual plots forward.

Question 8 O

- a) Without doubt YES
- b) Yes This is a stable sensible way of self build provision. The policy should be 10% or 5 units whichever is the greater but these should not be counted as rural exception sites. The policy should apply to small hamlets and villages within each parish so if there are more than one hamlet or village the 5 number should apply individually to all of them. THIS POLICY WOULD RESOLVE A MUCH NEEDED NEGLECTED SEGMENT.

MR P W SHAW



Stafford Borough
Council
16 APR 2020
-Received

Dear Sir

I enclose herewith representation documents towards the Stafford Borough issues and options 2020-2040. These are made on behalf of *Paul William Shaw*.


P W SHAW

DATE

12/04/2020

**New Stafford Borough Local Plan 2020-2040
 "Issues and Options" Consultation - Response Form**

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent's Details (if applicable)
Title	MR	
First Name	PAUL	
Surname	SHAW	
E-mail address		
Job title (if applicable)		
Organisation (if applicable)		
Address		
Postcode		
Telephone Number		

Thank you for taking the time to provide your comments on the "Issues and Options" document for the Stafford Borough Local Plan 2020-2040. All comments will be considered when preparing the Preferred Options for the New Local Plan.

Please return this form either by email (preferred) to: forwardplanning@staffordbc.gov.uk

or by post to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ

Please ensure receipt by Stafford Borough Council by 12.00 noon Tuesday 31 March 2020.

For advice on how to respond to the consultation and how to fill in this form, please see the Consultation Guidance Notes on the Council's website at: www.staffordbc.gov.uk/new-local-plan/ or call 07800 619636 / 07800 619650.

Please note:

- Comments must be received by 12noon on Tuesday 31 March 2020. Late comments will be considered "not duly made" under the Regulations;

**STAFFORD BOROUGH LOCAL PLAN 2020-2040
ISSUES AND OPTIONS CONSULTATION
DOCUMENT 2020 REPRESENTATIONS FOR
MR P W SHAW**

MARCH 10 2020

P W SHAW

TEL 07734291878



Site Name: Land at Woodcock Lane, Burston, ST18 0DS

Ward: Milwich

Parish: Sandon & Burston

Potential Yield: 69

Greenfield or Brownfield:
Greenfield

Deliverability Summary

Available:	The site is available.
Suitable:	No; the site is not within or adjacent to a currently recognised Local Plan settlement.
Achievable:	The site is achievable.
Status:	Not currently developable. A review of the adopted Sustainable Settlement Hierarchy would be required to remove the constraint.

Description:

The site is 4 hectares, and is currently used for agricultural purposes.

Availability Assessment

Some of the necessary infrastructure is considered to be available within the locality, but the provision of infrastructure to the site will need to be confirmed with the relevant utility companies. There are no known legal or ownership issues, and the site is available immediately.

Suitability Assessment

The site is not positioned within or adjacent to a currently recognised Local Plan settlement. The following constraints exist: Public Right of Way, Historic Environment Record.

Achievability Assessment

The site is classified as CIL typology RUR1, which is considered financially viable.



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INTRODUCTION

These representations are made on behalf of Mr P W Shaw of Burston Villa Farm Burston st180ds

These representations are not directly aimed at land owned by Mr Shaw but are answers to matters of interest.

Where matters directly relate to land in Mr Shaws ownership a reference will be made at the end of the relative paragraph by **PWS.**

Mr Shaw has interests in Burston and his land holding is reflected by the entry within the SHELAA.

”

Question 1A

The vision seems to be comprehensive apart from 1B below

Question 1 B

This element needs a much deeper scoping exercise than relying purely on the councils register. There is a much larger amount of residents who would like to build their own homes than the register shows and the basic problem arises in being able to source suitable plots and the restrictive nature of the present plan.

A new policy is needed to encourage self build opportunities everywhere in the borough from the smallest villages to the largest settlements. PWS

Question 3 A

The vision needs to change and items a, b, d and f are ones to be followed through. Item b however needs much more depth in regard to the provision of affordable, 1st time, elderly and special needs homes. The authority need to engage more with small local providers and landowners who are prepared to provide land at the right price to make this happen and ensure suitable affordable land is bought forward for development. Item m needs reconsideration in the evidenced light of delayed strategic land development and priority should be given to rectify this to release of more sites. PWS

Question 3 D

- 1) Allocate more sites within areas available but no new allocations added to the present strategic sites. There needs to be a much larger spread of sites to enable more choice and flexibility in bringing development forward. PWS

21 New development needs allocations across all villages regardless of size. PWS

25 Provide affordable homes in all villages regardless of size. PWS

Question 3F

There is urgent need for a thematic new policy to specifically cover small village sites and sites adjacent to existing settlement boundaries to allow for provision of affordable and self build homes. Presumption for development should be approved providing the authority and landowners can work together to provide land to accommodate these homes thereby adding supply to a much neglected and needed sector. **PWS**

Question 4 B and 4 D

No provision only adjacent to the motorway.

Question 5 A

Special Principle 1 should stay but needs to be applied as it should have been to available sites which can produce homes quickly and not preference the strategic sites.

Question 5 B

- a) Annual housing requirements E or G should be applied using the PCU. This will allow better growth on more sites giving choice and deliverability to encompass the EHDNA suggested strategy.
- b) The PCU needs inclusion as it is evidently clear that the two main strategic sites have failed in their projected delivery numbers at the outset of the present plan and it is clear they will fail in this new plan. These strategic sites will fail in numbers to 2031 and need supplementing with new sites to avoid continued shortfall.

Question 5 C.

A full discount is required due to the under delivery on the main strategic sites from the trajectories given at the outset of the existing plan. The two main sites have failed in the delivery of homes and this will continue and they will not be able to catch up these numbers pre 2031.

Stafford North as at March 2019 has still 2083 plots to be built pre 2031 which collates to 2883/10 years giving 288 units per annum. The rate for the past 5 years has been 53 This shows the under delivery being dismal against the projected numbers.

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The imbalance of development between the Key Service villages and Stafford/Stone clearly shows that there is a need for more diverse sites to be provided by increasing the settlement boundaries of Stafford/Stone as soon as possible. The allocation by extending the core settlement boundaries would correct the imbalance which has been created in the past 5 years.

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There are landowners ready willing and able to provide this land. The smaller villages do not need settlement boundaries but can be decided on individual choice. The policies at present are too restrictive in relation to small village development and need relaxing as they can play a valuable part to the provision of varied development in the borough. **PWS**

Question 5 F

- a) Yes
- b) All except Intensification around the edges of the two main settlements at Stafford/Stone.
- c) Intensification of the main settlements of Stafford/Stone best uses the existing infrastructure and adds to sustainability whilst upgrading of existing facilities by way of developer contributions.

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No. The inclusion now of a new garden community would delay much needed housing growth and only hinder practical planning decisions pre 2031. Provision of homes from a new garden community will take a minimum of 15 years or longer will be highly controversial and will require longer transport links with its own environmental problems. New garden communities outwith existing settlements undermine the settlement viabilities and sustainability whereas using resources to enhance existing core settlements is a highly efficient way to upgrade. New garden community will create transport, infrastructure and environmental nightmares.

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The borough are trying to encourage residents to use these two centres and promoting them daily and then to take the reverse view would undermine their viability even further. A garden community site of whatever size will never provide 500 units per annum and within the borough history verifies this. No site has ever provided this number of dwellings and to assume a new centre would is to say the least misleading in its content. A garden community purporting this 500 unit per annum would never pass scrutiny with the Inspector as it would be found to be unsound in its ability based on past deliveries. Proposing delivery of this scale from one outlet is ludicrous and contrary to any planning in this borough. The provision of housing must be supplied by existing sites mainly by way of extended settlements of Stafford/Stone where certainty can be assured and not "pie in the sky" delivery.

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Economic scenario E special option 3 with no garden community is the essential model. The provision of a garden community cannot be guaranteed whereas sites within extended settlements of Stafford/Stone can. Any pressure build up can be removed easily from Stafford/Stone by provision of extending the existing settlement boundaries. A new garden community would be a planning mistake. Settlements of below 50 dwellings do not need settlement boundaries but policies to cover them must be flexible so as to allow landowners and existing residents to provide homes without the existing moratorium of development presently existing.

Question 8 A

No There are insufficient brownfield sites within the borough and the availability of many of them to come forward is not accurately calculable for miriads of reasons. The inclusion should be a windfall calculation.

Question 8 B

NO

Question 8 C

Yes this would reflect the need and availability of the type of dwellings as a sustainable element of allocations

Question 8 D

NO this is an element that should be controlled by supply and demand, market forces and cost

Question 8 E

As above at 8 D

Question 8 F

YES

Question 8 G

Smaller housing units are desperately needed throughout the borough for affordable homes, 1st time buyer homes elderly persons dwellings and special needs accommodation.

The provision of these on the strategic sites has been slow, expensive and sometimes non-existent. The rural small and large villages have a large unsatisfied need for this type of housing and this plan as against the present plan places a massive opportunity to provide for this. Small villages have aging populations unable to move due to lack of housing. Siblings have to move out of villages unable to afford homes. Larger homes who need to downsize cannot due to lack of housing

The solution lies with this plan. There are landowners prepared to offer land heavily discounted to help this problem and the authority need to engage with them to solve a mounting problem. The fact that there are landowners willing to help needs to be within the public domain for discussion.

Question 8 H

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Question 8 I

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Question 8 k

a) Yes the provision of affordable homes is essential and any target should be towards the high end at 389 dwellings per annum. This can be achieved by

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Question 8 l

No

Question 8m

Yes

Question 8 N

- a) No This would be too restrictive unless there were clear access points and services available however this scenario is not within a large developers business model as it is messy and difficult to police. Individual self build plots should be what it says "individual".
- b) There should be a general policy of provision throughout the borough from within the smallest hamlet up to the large settlements and they should be proactively allowed by the borough. The smaller villages are possibly best suited to this type of development as its small does not undermine character and helps sustainability and

should be actively encouraged. Once again landowners in small villages could be encouraged to bring individual plots forward. PWS

Question 8 O

- a) Without doubt a resounding YES
- b) Yes This is a stable sensible way of self build provision. The policy should be 10% or 5 units whichever is the greater but these should not be counted as rural exception sites. The policy should apply to small hamlets and villages within each parish so if there are more than one hamlet or village the 5 number should apply individually to all of them. THIS POLICY WOULD RESOLVE A MUCH NEEDED NEGLECTED SEGMENT.

The Planning Department
The Forward Planning team
Stafford Borough Council
Civic Centre
Riverside
Stafford
ST16 3AQ.

19th of April 2020

Dear Sir/Madam,

Re: STAFFORD BOROUGH LOCAL PLAN 2020-2040 ISSUES AND OPTIONS CONSULTATION

This letter includes the formal comments from the National Custom & Self Build Association (NaCSBA) to the *Stafford Borough Local Plan Issues and Options* Consultation.

NaCSBA's mission is to substantially increase the number of people able to build or commission their own home and they believe that opportunities should arise for prospective self and custom-builders through the Local Plan process.

Custom & Self-Build

As identified in the Issues and Options document, The Self-Build and Custom Housebuilding Act of 2015 mandates that all Local Planning Authorities keep a register of parties interested in designing and building their own homes in their locality. NaCSBA are pleased to note that Stafford Borough Council do keep a self-build register to which prospective self-builders can sign up via the council's website.

The *Right to Build* legislation clearly demonstrates how the government intends for LPAs to respond to the requirements set out in the NPPF when drawing up new Local Plans. LPAs should take a proactive position to providing land and should undertake rigorous and effective evidence gathering to measure custom and self-build need in their districts. And LPAs that do not do so can expect their Local Plans to be found unsound at examination.

The Housing and Planning Act 2016 conferred on LPAs the responsibility to:

“Give suitable development permission in respect of enough serviced plots of land to meet the demand for self-build and custom house building in the authority's area...”

The Act established that evidence of such demand would be provided by registers which LPAs are required to keep in accordance with the 2015 Self-Build and Custom Housebuilding Act.

Paragraph 61 of the revised National Planning Policy Framework (NPPF) sets out the requirement for Local Planning Authorities (LPA) to plan for a wide choice of high quality homes to support sustainable communities and provide greater opportunities for home ownership. It goes on to state:

“The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).”

Furthermore, the NPPF makes clear how small and medium sized sites can make an important contribution to meeting the housing requirement of an area. The identification and promotion of small and medium sites as per the NPPF paragraph 61 can be promoted in order to support the needs of custom and self-builders.

Indeed, recent appeal decisions have highlighted and confirmed the significance that should be afforded to self-build as a material consideration in determining planning applications, which in turn demonstrates the importance of CSB in housing delivery. Examples of such appeal decisions include:

- A proposed development of up to 215 homes, public open space and associated infrastructure, which involved a significant custom build portion, at Land east of Park Lane, Coalpit Heath (APP/P0119/W/17/3191477). The Inspector noted that ‘there are three different components of the housing that would be delivered: market housing, affordable housing (AH) and custom-build housing (CBH). They are all important and substantial weight should be attached to each component’.
- Development of land for the provision of 22 custom/self-build dwellings with associated access, parking provision and amenity space at Land east of St Edmunds Lane, Great Dunmow (APP/C1570/A/14/2223280) in which the Inspector ‘afforded the provision of custom/self-build housing significant weight’ in their consideration of the appeal.

Further examples of similar appeal decisions can be provided on request.

As a consequence of the policy and guidance outlined above, it is clear that LPAs have a duty conferred upon them to actively meet the needs of those wishing to build their own homes.

In order, therefore to discharge its duty to those wishing to build their own home it is apparent that the LPA must set out in the emerging Local Plan how it will ensure that the needs of those wishing to build their own homes will be met.

Question 8.N - Self and Custom Build Housing

NaCSBA is encouraged to see that the Issues and Options considers how the needs of those wishing to build their own home should be met.

- a) *Should the council introduce a policy requiring all new developments with a site capacity of over 100 dwellings to provide 5% of those plots as serviced plots available for self and custom build homes?*

Self-builders do not generally want self-build plots on large estates. One of the primary reasons for self-build is to be able to construct a bespoke home on a bespoke plot. It is considered that requiring 5% of large sites to be delivered as Custom and/or Self-Build will do little for the supply of self-build homes in the borough given that they will be quite unattractive to the majority of self-builders. Essentially, it could be considered that this technically discharges the LPA's duty to

those wishing to build their own home, but the reality is that such a policy would do little to promote custom or self-build.

b) Should the council allocate plots for the purpose of self-build throughout the borough?

This approach is considered significantly more appropriate than part a). Indeed, this is one of the most desirable and effective means of delivering self-build opportunities for a number of reasons. Firstly, being allocated for CSB gives a site the strongest possible chance of actually being built out for custom and /or self-build. By allocating small-scale SCB sites, LPAs can deliver the sorts of CSB opportunities that prospective self-builders want to build on – it is known that prospective custom and self-builders do not normally want to build their own home on a large estate. It is considered that CSB sites of up to 20 plots will normally be more attractive to those wishing to build their own home. Lastly, the mechanism gives LPAs control over where CSB should be built, enabling extra control over the design process, which can be further augmented by the use of plot passports.

In addition to allocating sites specifically for custom and self-build, the LPA should consider an exception sites policy. There are some very successful rural exception policies within local plans that provide good opportunities for those who wish to pursue affordable provisions.

It is considered that there are opportunities to be innovative and allow a greater degree of flexibility. In other local plans policies are being introduced to facilitate the provision of 'Market' CSB on small sites (below 9 units), which are contiguous with adjoining settlement limits, where services exist thus ensuing sustainability. NaCSBA considers that communities are more supportive of new well designed sustainably built dwellings for local people than they are for developer-led market housing. This approach would enable people on the self-build register who want to invest in their community and build a home for the long term to be able to make a positive contribution to local communities.

In order to meet the requirements, set out by national policy, it is important that the Local Plan is proactive and progressive in the area of CSB. It is not considered sufficient to simply include a policy that simply states that the LPA will 'encourage delivery of building plots for custom and self-build, and percentage requirements on large sites are not considered appropriate for the vast majority of CSB demand, a mix of policy approaches should be included.

Instead, in order for the plan to be considered to be positively prepared and consistent with national policy a Local Plan must demonstrate specifically and in some detail how it will ensure that the needs of custom and self-builders are to be met.

Recommendations

There are a number a different policy mechanisms that could be employed to ensure a steady and sufficient provision of CSB opportunities within the borough, which would mean that the plan could be considered to meet needs of those wishing to build their own home, including:

- Do not include policy requiring all new developments with a site capacity of over 100 dwellings to provide 5% of those plots as serviced plots available for self and custom

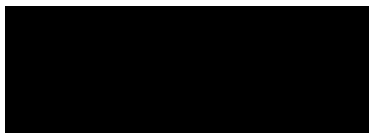
build homes. Such a policy does not deliver the types of plots that the majority of self-builders are seeking.

- Apply a mix of policy approaches, as a *one size fits all* policy approach does not offer real choice and opportunity for custom and self-build.
- Do allocate sites specifically for custom and self-build.
- Consider a rural exception policy in which small-scale sites, which are outside settlement boundaries but sustainable and well-related to the settlement, can be considered appropriate for self-build.

On behalf of NaCSBA, it is hoped the above comments assist your deliberations.

Please contact me if you require any additional information.

Kind regards,

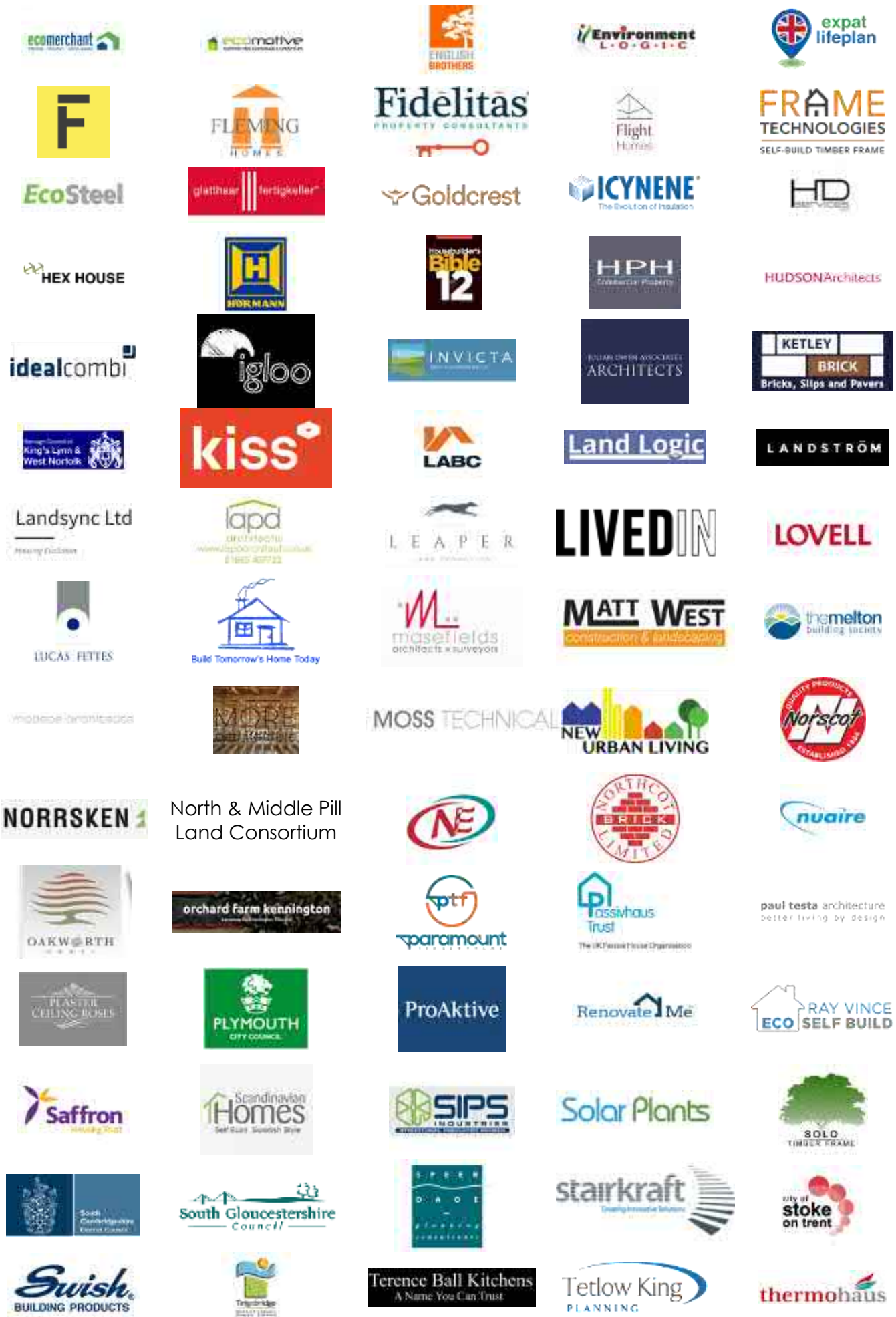


Sally Tagg MRTPI -Technical Representative On behalf of NaCSBA

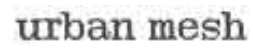
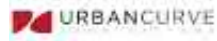
(Managing Director of Foxley Tagg Planning)

This representation has been prepared on behalf of NaCSBA and its supporters, who are listed overleaf and comprise businesses and organisations in the custom- and self-build sector.





North & Middle Pill Land Consortium



**New Stafford Borough Local Plan 2020-2040
 “Issues and Options” Consultation - Response Form**

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent’s Details (if applicable)
Title	Mr	Mr
First Name	Gillan	Graham
Surname	Paris	Fergus
E-mail address		
Job title (if applicable)	Director	Planning Consultant
Organisation (if applicable)	Inglewood Investments	First City Limited
Address		
Postcode		
Telephone Number		

Thank you for taking the time to provide your comments on the “Issues and Options” document for the Stafford Borough Local Plan 2020-2040. All comments will be considered when preparing the Preferred Options for the New Local Plan.

Please return this form either by email (preferred) to: forwardplanning@staffordbc.gov.uk

or by post to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ

Please ensure receipt by Stafford Borough Council **by 12.00 noon Tuesday 21 April 2020.**

For advice on how to respond to the consultation and how to fill in this form, please see the Consultation Guidance Notes on the Council’s website at: www.staffordbc.gov.uk/new-local-plan or call 07800 619636 / 07800 619650.

Please note:

- Comments must be received by 12noon on Tuesday 21 April 2020. Late comments will be considered “not duly made” under the Regulations;
- Please fill in a separate Part B for each question/paragraph/table/topic you are commenting on and, where necessary, please explain your response;
- Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name Gillan Paris		Inglewood Investments			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph	5.26/5.98 /8.31	Table	5.5
Figure		Question	Question 5D/5P	Other	Question8G
2. Please set out your comments below					
Question 8M					
<p>We support your proposition that where development has not yet commenced on a Rural Exception Site planning permission that the site is converted to Rural Affordable Housing Site Allocation.</p> <p>In terms of the future growth of settlements Hopton stands out within the Rural, Area yet it is a prime example of a village where the population is ageing, and new blood is required to stimulate the housing market and increase investment in the services.</p> <p>Affordable housing need in the borough in the latest EHDNA report is in the range 259 – 389 dwellings per annum between 2020 and 2040. This is a significant proportion of the locally assessed need based on the standard method figure of 408 dpa, Furthermore, rural Stafford has the highest proportion of older people, particularly couples, but the smallest proportion of small affordable properties.</p> <p>We are proposing a rural exception development off Wilmore Lane, Hopton including bungalows, some of which will be constructed to M4(3) wheelchair user standard and an open space with landscaping.</p> <p>Affordable housing land supply that meets local housing needs is critical to the Government’s housing delivery objectives. For specific sites on which the local plan relies to ensure delivery targets it is essential that these dwellings are maintained in perpetuity as local needs housing units through a Section 106 Agreement.</p>					

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1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question		Other	
2. Please set out your comments below					

Please use a continuation sheet if necessary

All comments should be made in writing preferably using this form and should be received by Stafford Borough Council **no later than 12 noon Tuesday 31 March 2020.**

You can view the documents online at www.staffordbc.gov.uk/new-local-plan-

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or post your comments to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ

Thank you for taking the time to contribute to this consultation.

NEW LOCAL PLAN 2020-2040: ISSUES & OPTIONS
STAFFORD BOROUGH COUNCIL – PRIVACY NOTICE

How we will use your details

All representations received to the Stafford Borough New Local Plan 2020-2040 Issues & Options consultation document will be included in a schedule and made publicly available once the consultation has closed.

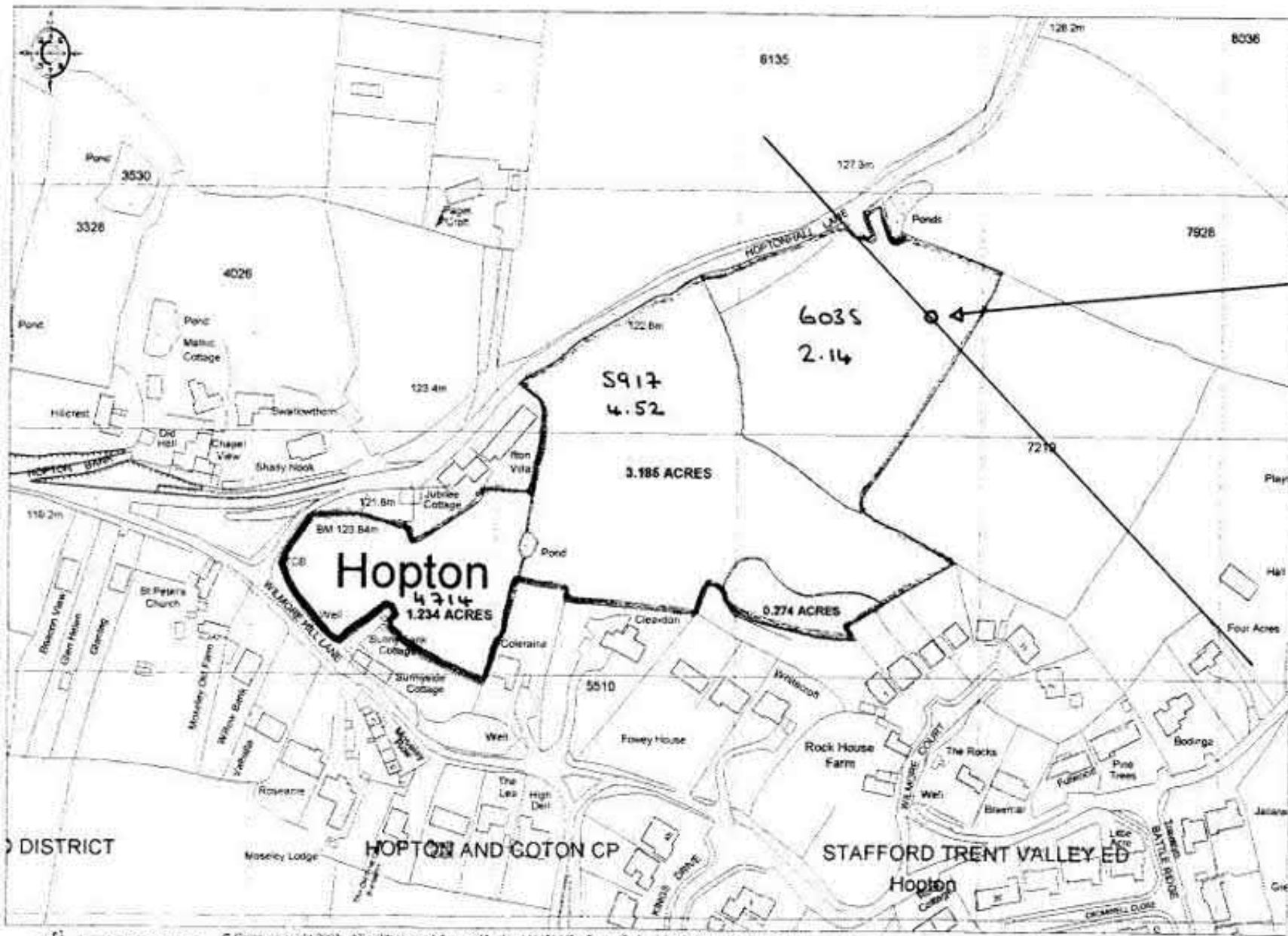
Stafford Borough Council will consider all representations received, using them to inform the next stage of the process for the New Local Plan 2020-2040.

Comments cannot be treated as confidential. Your personal information, such as your postal and email address will not be published and signatures will be redacted, but your name and organization will be made available. We will only use your personal information to send you information on the New Local Plan and associated planning policy matters.

We believe you should always know what data we collect from you and how we use it, and that you should have meaningful control over both. As part of our ongoing commitment to transparency, and in relation to the new General Data Protection Regulations (May 2018), we have updated our Privacy Policy.

Stafford Borough Council are the data controller and you can find information about how we handle your personal data by visiting www.staffordbc.gov.uk/privacynotices and if you have any queries or would like to unsubscribe from receiving information then please contact forwardplanningconsultations@staffordbc.gov.uk

Land at Hopton Lane, Hopton, Stafford.



ELECTRIC POLE +
WIRE STAB.
NO: 41353
(MAP REF: -
SI 9465 2625)

**New Stafford Borough Local Plan 2020-2040
 “Issues and Options” Consultation - Response Form**

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent’s Details (if applicable)
Title		Mr
First Name		Neil
Surname		Cox
E-mail address		[REDACTED]
Job title (if applicable)		Director
Organisation (if applicable)	Richborough Estates	Pegasus Group
Address		[REDACTED]
Postcode		[REDACTED]
Telephone Number		[REDACTED]

Thank you for taking the time to provide your comments on the “Issues and Options” document for the Stafford Borough Local Plan 2020-2040. All comments will be considered when preparing the Preferred Options for the New Local Plan.

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Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name: Neil Cox		Organisation: Pegasus Group on behalf of Richborough Estates			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	See attached	Other	
2. Please set out your comments below					
<p>Please see attached representation structured in order of questions raised within Issues & Options consultation document.</p>					

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question		Other	
2. Please set out your comments below					

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NEW LOCAL PLAN 2020-2040: ISSUES & OPTIONS

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STAFFORD BOROUGH LOCAL PLAN 2020-2040

ISSUES & OPTIONS (JANUARY 2020)

LAND AT HORSESHOE, AUDMORE, GNOSALL

ON BEHALF OF RICHBOROUGH ESTATES



**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**

Pegasus Group



CONTENTS:

Page No:

1.	INTRODUCTION	1
2.	CONTEXT	3
3.	EVIDENCE	4
4.	VISION & STRATEGIC OBJECTIVES	5
5.	SUSTAINABILITY & CLIMATE CHANGE	7
6.	THE DEVELOPMENT STRATEGY	9
7.	DELIVERING HOUSING	18
8.	DELIVERING QUALITY DEVELOPMENT	26
9.	ENVIRONMENTAL QUALITY	32
10.	LAND AT HORSESHOE, AUDMORE, GNOSALL	34
11.	CONCLUSION	38

APPENDICES:

APPENDIX 1: SITE LOCATION PLAN

APPENDIX 2: INDICATIVE MASTERPLAN

1. INTRODUCTION

- 1.1 These representations are made by Pegasus Group, on behalf of Richborough Estates in response to the Stafford Borough Local Plan Review (2020 – 2040) 'Issues and Options Consultation Document February 2020.' These representations relate to land at Horseshoe, Audmore, Gnosall. A site plan is attached at **Appendix 1**. The site relates to SHELAA Ref. GNO05.
- 1.2 Richborough Estates has land interests at Horseshoe, Audmore, Gnosall. Their interests comprise approximately 5.57 hectares of land, located to the north-eastern edge of Gnosall. The site is currently in agricultural use.
- 1.3 The site has the capacity to deliver a minimum of 55 new homes as part of a carefully considered housing development and publicly accessible open space. An indicative masterplan is attached at **Appendix 2**.
- 1.4 These representations respond to the 'Issues and Options' consultation document and accompanying published evidence, having regard to the national and local policy context. Where appropriate, Richborough Estates provide a response to the specific questions set out within this document.
- 1.5 The representations are framed in the context of the requirements of the Local Plan to be legally compliant and sound. The tests of soundness are set out in the National Planning Policy Framework (NPPF), paragraph 35. For a Plan to be sound it must be:
- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

1.6 The representations also give consideration to the legal and procedural requirements associated with the plan-making process.

2. CONTEXT

- 2.1 Richborough Estates supports Stafford Borough Council's decision to commit to a review of the adopted Stafford Borough Local Plan. This provides an opportunity for the Council to comprehensively review the vision, strategic objectives, development requirements, spatial development strategy and policies for shaping detailed development proposals.
- 2.2 The most recent National Planning Policy Framework (NPPF) (February 2019) requires local planning authorities to keep their Local Plan up to date by undertaking a review at least every five years. The proposed timescales, as set out within the Local Development Scheme, will ensure that an up to date Local Plan for the Borough will be in place to support growth and meet future development needs.
- 2.3 The Local Plan Review is necessary in order to respond to the need for continued growth within the Borough to 2040 and to ensure consistency with national policy and guidance.
- 2.4 The Issues and Options consultation follows previous Issues consultation, which scoped issues that affect the Borough, and looked at options for addressing them. The Issues document also set out a proposed new settlement hierarchy that had regard to the Settlement Assessment. The current consultation document utilises the response to the previous consultation to further explore the vision and strategic objectives to 2040 and highlights a range of growth and spatial strategy options for delivering growth within the Borough.
- 2.5 Richborough Estates supports the Council's proactive approach in continuing with a review of the Local Plan to ensure that an up to date policy framework exists within the Borough to guide growth to 2040 and to ensure that development is genuinely plan led.

3. EVIDENCE

Question 1A: Is the evidence that is being gathered a suitable and complete list?

- 3.1 The list of assessments and studies identified within the consultation document represents a suitable list, however it should be recognised that this evidence should be refreshed throughout the review process where necessary to reflect changing circumstances or guidance. In addition, Richborough Estates recognises that elements of the evidence base will need to be iterative with the emerging growth requirements and spatial distribution of growth.
- 3.2 The vision is supported by Richborough Estates and reflects the existing Vision contained within the adopted Local Plan Strategy which remains appropriate for an extended plan period to 2040.

Question 1B: Have any key pieces of evidence necessary for Stafford Borough's new Local Plan been omitted?

- 3.3 Paragraph 1.10 makes reference to an 'Infrastructure Delivery Programme' which is assumed to represent an Infrastructure Delivery Plan identifying the necessary infrastructure to support new development. Again, it is recognised that this will be refined at each stage of the plan making process being intrinsically linked to any preferred spatial strategy and the outcome of discussions through the Duty to Cooperate.

4. VISION & STRATEGIC OBJECTIVES

- 4.1 It is noted that the adopted Local Plan contains a detailed Vision and a significant number of Key Objectives. Both the Vision and Key Objectives contain a number of spatially specific elements i.e. Stafford, Stone or lower tier settlement specific elements. Richborough Estates considers it is necessary to review this approach.

Question 3.A: Do you agree that the Vision should change?

- 4.2 Richborough Estates considers that the Vision contained within the adopted Local Plan is overly protracted and fails to clearly and succinctly set out a comprehensive Vision for the Borough.
- 4.3 The Local Plan Review process provides a perfect opportunity to distil the current Vision into a locally relevant, yet Borough-wide Vision that clearly aligns to the spatial change sought in Stafford Borough to 2040.

Question 3.B: Do you agree that the Vision should be shorter?

- 4.4 Richborough Estates agrees the Vision should be shorter as set out above. This could be achieved through the removal of the sub-sections for both Stafford and Stone which would sit more usefully within a Neighbourhood Plan to be defined and refined by local communities.

Question 3.C: Do you agree that a new Vision, whilst maintaining a commitment to growth, should more explicitly recognise the need to respond to Climate Change and its consequences?

- 4.5 The 'Scoping the Issues' consultation summary contained within the current consultation document identified the support for renewable energy sources and the future proofing of new development via the use of technology as reoccurring or key responses.
- 4.6 It is recognised that Stafford Borough Council has declared a 'climate emergency' and has committed to preparing a report to set out how the Council proposes to respond. The implications of climate change for emerging policy to be contained within a new Local Plan should be informed by the Council's Climate Change Strategy/Report currently in preparation. Richborough Estates considers that any recognition of Climate Change to be incorporated within the Vision should await the outcome of the Council's corporate stance on climate change.

Question 3.D: Should the spatially-based approach to the objectives be retained? Does this spatially-based approach lead to duplication?

4.7 Richborough Estates considers the 28 key objectives contained within the adopted Local Plan to be protracted and repetitive. This is, in part, due to the spatially-based approach taken by the Borough Council previously.

4.8 In line with comments in respect of the Vision, Richborough Estates consider that the review provides an opportunity to distil elements of the current objectives that remain relevant to the Borough, into a concise set of Borough-wide objectives.

Question 3.E: Is the overall number of objectives about right?

4.9 Richborough Estates considers the list of current objectives is far too long. A shorter list of succinct, locally relevant Borough-wide objectives would provide greater clarity and understanding of the most important areas of change or protection within the Borough.

Question 3.F: Should there be additional objectives to cover thematic issues? If so what should these themes be?

4.10 Richborough Estates does not support the preparation of additional objectives, but reconsideration of the existing objectives. Updated objectives should include:

- Approach to spatial distribution of growth to support sustainable communities
- Meeting housing needs
- Economic growth requirements
- Infrastructure delivery
- Range of locally relevant thematic topics that would include climate change, centres, leisure, heritage, ecology, landscape and the creation of high-quality new development.

5. SUSTAINABILITY & CLIMATE CHANGE

Question 4.A: Efforts to increase energy efficiency within the Borough are currently detailed in Policy N2 of the adopted Plan for Stafford Borough. However, the increasing recognition that more needs to be done to mitigate the effects of climate change suggests that measures in excess of this will now be necessary. Should the new Local Plan require all developments be built to a standard in excess of the current statutory building regulations, in order to ensure that an optimum level of energy efficiency is achieved? What further policies can be introduced in the Local Plan which ensures climate change mitigation measures are integrated within development across the Borough?

- 5.1 Whilst it is commendable to deliver enhanced energy efficiency as part of a proposal, it is important that local planning policies do not accelerate beyond requirements of building regulations, particularly without evidence to support that such requirements are deliverable and will not prevent the speedy delivery of housing in accordance with the aspirations of the NPPF.

Question 4.C: Should the Council introduce a policy requiring large developments to source a certain percentage of their energy supply from on-site renewables?

- 5.2 Whilst it is commendable to deliver renewable and low carbon energy as part of a proposal, it is important that local planning policies do not accelerate beyond requirements of building regulations, particularly without evidence to support that such requirements are deliverable and will not prevent the speedy delivery of housing in accordance with the aspirations of the NPPF.

- 5.3 The ability for large developments to source a certain percentage of their energy supply from on-site renewables will need to be balanced with the burden of delivering other infrastructure requirements that will be required to support the chosen spatial strategy to ensure the delivery of sustainable communities.

Question 4.E: Should the Council implement a higher water standard than is specified in the statutory Building Regulations?

- 5.4 Whilst it is commendable to deliver water conservation and efficiency, it is important that local planning policies do not accelerate beyond requirements of building regulations, particularly without evidence to support that such

requirements are deliverable and will not prevent the speedy delivery of housing in accordance with the aspirations of the NPPF. Optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the PPG. This evidence does not appear to be present.

- 5.5 The policy approach should be informed by a Water Cycle Study to determine whether the scale, location and timing of planned development within the Borough would give rise to issues from the perspective of supplying water and wastewater services and preventing deterioration of water quality in receiving waters.

6. The Development Strategy

- 6.1 Richborough Estates supports the review of the spatial development strategy to establish the scale and distribution of new housing and employment development to 2040.

Question 5.A: Do you consider that the existing Policy SP1 addresses the requirements of the NPPF? Do you consider that it is necessary to retain this policy in light of the recent changes in Planning Inspectorate's view?

- 6.2 Policy SP1 contained within the existing Plan for Stafford Borough broadly addresses the requirements of the NPPF. It is considered appropriate to retain a policy committing the Council to applying the presumption of sustainable development within any new Plan for the Borough to 2040. The continuation of such a policy is therefore recommended by Richborough Estates.

Question 5.B: Which Annual Housing Requirement figure do you think will best meet Stafford Borough's future housing growth requirements? What is your reasoning for this answer? Should a Partial Catch Up rate allowance be incorporated? What is your reasoning for this answer?

- 6.3 The preparation of the EDHNA is noted by Richborough Estates. The approach taken in the EDHNA to consider a range of scenarios and accelerated headship rates is supported, particularly in respect of the consideration of balancing housing delivery with economic growth likely to be experienced and supported through the aspirations of the Borough.
- 6.4 Scenario A, which represents the Standard Method, relies on the SNHPs which draws from past trends.
- 6.5 The Government confirms the use of the 2014 Sub-National Household Projections to provide the demographic baseline for the assessment of housing need in the short term and the Government's intention to review the formula and consider amending the method in the longer term. The baseline figure represents a minimum figure and does not account for additional housing demand that may arise as a direct result of economic growth during the plan period. Furthermore, it does not include meeting housing needs arising from neighbouring authorities.
- 6.6 It represents a position that does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have

- on demographic behaviour, including meeting cross-boundary needs. Richborough Estates therefore does not consider that this represents the most appropriate annual housing requirement for Stafford Borough.
- 6.7 Scenario's B and C represent a housing requirement that is lower than the Standard Method. There are no exceptional circumstances that can be demonstrated in Stafford Borough to justify an annual housing requirement below the Standard Method. Richborough Estates therefore consider it is appropriate for these two scenarios to be discounted.
- 6.8 Scenarios D, E, F and G apply different jobs growth assumptions. The EDHNA recognises that the *"jobs projections, modelled in PopGroup, suggest that there would have to be an uplift to the demographic baseline if the employment growth /policy-on forecasts are to be realised, ranging from 435 dpa (Scenario D CE Economic Forecasts) to 683 dpa (Scenario F Past Trends Jobs Growth). These equate to between 489 dpa and 746 dpa incorporating PCU rates."* Options D to G are the only options to require a level of housing growth similar or higher than the those set out in the current Plan for Stafford Borough.
- 6.9 Richborough Estates agrees there is a clear risk that where the labour force supply is less than the projected job growth, this could result in unsustainable commuting patterns and reduce the resilience of local businesses, resulting in a barrier to investment. In addition, if the objective of employment growth is to be realised, then it will generally need to be supported by an adequate supply of suitable housing. Jobs growth and housing growth are intrinsically linked and should be balanced to ensure a sustainable strategy to 2040.
- 6.10 Whilst COVID-19 might bring short-term economic uncertainty it has to be remembered that the Plan period is to 2040 and Government initiatives (such as furlough) are designed to try and lessen a downturn in the longer term. It should therefore not hinder the Council's future growth aspirations when looking across the Plan period to 2040.
- 6.11 Scenario D utilises the CE Baseline and represents a level of jobs growth that is significantly lower than past trends in jobs growth in the Borough and does not reflect the Council's future growth aspirations. Richborough Estates consider that this should therefore be discounted.

- 6.12 Scenario E assumes the delivery of a new Garden Community which would attract £750k of Government funding to develop detailed plans for key infrastructure such as highway improvements, schools, water and energy provision. It also assumes delivery of a major development proposal at Stafford Station. In total these proposals are assumed to create an additional 12,500 new jobs in the Borough. If both a Garden Community and the Stafford Station Gateway projects are pursued it is considered appropriate to utilise this scenario as an absolute minimum to guide the housing requirement. Despite this, jobs growth should also be considered beyond a Garden Community and the county town of Stafford.
- 6.13 Scenario F reflects the jobs growth that has been experienced within Stafford Borough in the past (2000 to 2018). The EDHNA concludes that *"it is considered, given the current economic climate, that this rate of jobs growth is unlikely and would not be able to be sustained over the Plan Period. It is recognised that the current period is one of considerable economic uncertainty, in part as a result of Brexit, and that this may change, leading to more favourable economic conditions."* Richborough Estates would disagree with this conclusion on the basis that past jobs growth included a significant period of economic uncertainty, namely a prolonged recession, and fails to take account of the 12,500 additional jobs that could be created through the Stafford Station Gateway and a new Garden Community contained within Scenario E.
- 6.14 Scenario G (CE Baseline + 50% scenario) considers an intermediate level of jobs growth between Scenario D and Scenario F, *"reflective of jobs growth associated with the development of Stafford Station Gateway but not including jobs associated with a potential New Garden Community development."* This scenario appears arbitrary in assuming that the Council's economic growth aspirations will not be met without a Garden Community and that any growth over and above the baseline would only be attributable to Stafford Station Gateway. Richborough Estates considers this approach to be flawed.
- 6.15 Richborough Estates considers that the most appropriate Scenarios are Scenario E and F. Scenario E should be utilised as an absolute minimum if a Garden Community proposal were to be pursued. In addition, Richborough Estates considers that a level of economic growth that reflects past trends jobs growth is achievable over the plan period.

- 6.16 Richborough Estates would also support the inclusion of partial catch-up rates in respect of headship rates, to ensure that household formation rates suppressed in the past are rebalanced looking to the future.

Question 5.C: In calculating the Housing Requirement figure for the New Local Plan 2020-2040 should a discount be applied to avoid double counting of new dwellings between 2020-2031? If a discount is applied should it be for the full 6,000 new homes currently accounted for in the adopted Plan for Stafford Borough or a reduced number? Please explain your reasoning.

- 6.17 The Housing Requirement figure for the New Local Plan should be expressed as a total figure without discount as the New Local Plan will replace the current Plan for Stafford Borough.
- 6.18 It is logical that existing uncommitted allocations or other sites relied upon to deliver homes by 2031 may contribute to this housing requirement. However, any existing site that is to be relied upon should be subject to the same scrutiny and assessment as any other 'reasonable option' being promoted through the Local Plan Review process. Any site deemed to be available, suitable and achievable and determined to be deliverable or developable should then inform a Borough wide trajectory for the period 2020-2040.
- 6.19 Through the Local Plan Review it is considered essential to review all sources of housing supply, including existing commitments. Whilst it is recognised that the Plan for Stafford Borough was only completed in 2017, further information or evidence may have arisen since adoption that raises questions of suitability or delivery of sites allocated.
- 6.20 All potential sources of supply should be scrutinised through the Local Plan Examination in Public, especially non-allocated windfall sites, and it is recommended that a site-specific housing trajectory is prepared to support the Preferred Options consultation. This should provide delivery assumptions in respect of any proposed preferred option allocation i.e. build out rates and lead in times.
- 6.21 If sites currently relied upon for delivery prior to 2031 no longer represent a deliverable or developable proposition or there are more appropriate alternatives in line with a new spatial development strategy, they should be removed from the supply and the emerging Local Plan as appropriate.

- 6.22 Richborough Estates consider that it is highly unlikely that a future supply of 6,000 homes can be demonstrated in Stafford Borough to 2031 through existing planning commitments and uncommitted allocations.

Question 5.D: Do you agree with the basis for the preparation of the 2019 Settlement Hierarchy? Do you agree that the smaller settlements should be included in the Settlement Hierarchy?

- 6.23 Richborough Estates supports the emerging Settlement Hierarchy in that it identifies Gnosall as a 'Larger Settlement.' This reflects Gnosall's position as one of the largest settlements within the Borough and the sustainability credentials of the village.
- 6.24 Richborough Estates has no particular view in respect of including the Tier 6 'Smaller Settlements' however, inclusion within the settlement hierarchy should not in itself result in such settlements being afforded growth requirements through a spatial development strategy. Development growth should be focused to the most sustainable settlements within the Borough, including Gnosall.

Question 5.E: The northern built up areas of the Borough are not properly recognised in the currently adopted Plan – most notably Blythe Bridge, Clayton and Meir Heath/Rough Close. Should these areas be identified in the Settlement Hierarchy for development?

- 6.25 Whilst Richborough Estates has no particular view on whether built-up areas to the north of the Borough should be included within the settlement hierarchy, inclusion in itself, should not determine whether these areas should form part of the spatial development strategy for delivering growth. Development within this area should have regard to any cross-boundary requirements related to Stoke-on-Trent and Newcastle-under-Lyme in particular and should recognise that non-Green Belt opportunities are suitable for development elsewhere in the Borough, including Gnosall.

Question 5.F: In respect of these potential scenarios do you consider that all reasonable options have been proposed? If not, what alternatives would you suggest? Are there any of these spatial scenarios that you feel we should avoid? If so, why? Which of these spatial scenarios (or a combination) do you consider is the best option? Please explain your answer.

6.26 Richborough Estates considers that all reasonable potential spatial scenarios have been identified, however it is recognised that some of these options are not mutually exclusive. In addition, it is considered that the Garden Communities scenario and Intensification of Town and District Centres are not appropriate to be pursued in isolation.

6.27 It is important that a range of sites across a wide geographical area would provide greater certainty for delivery. Richborough Estates considers that the spatial distribution of growth should be driven by sustainability and the existing settlement hierarchy where possible to support the enhancement of sustainable communities.

Question 5.G: Do you consider that the consideration and utilisation of a new Garden Community/Major Urban Extension (or combination) would be helpful in determining the approach to satisfying Stafford Borough's future housing and employment land requirements? If you think the Garden Community/Major Urban Extension approach is appropriate which of the identified options is the most appropriate?

6.28 The NPPF recognises that planning for larger scale developments such as new settlements or significant extensions to existing towns may be the best way to achieve future supply, provided it is well designed, located and provided with the necessary infrastructure and facilities.

6.29 The Greater Birmingham HMA Strategic Growth Study sets out a number of social and community infrastructure assumptions for new towns/settlements which may be relevant, as follows:

- *"mixed-tenure home and housing types;*
- *employment land provision sufficient to meet aspiration of self-containment;*
- *include integrated health care practice or practices;*
- *include provision of primary school(s) and secondary school;*
- *include provision of local centres to meet everyday convenience shopping needs and provision of 'town centre' incorporating a range of comparison and convenience stores;*
- *provide facilities for community/cultural activities;*

- *uses zero-carbon and energy-positive technologies;*
- *provide coordinated recreational and sporting facilities (including a swimming pool) that meet the needs of the development;*
- *delivery of comprehensive green infrastructure within the new settlement."*

6.30 Land at Horseshoe, already has excellent local access to local services and facilities, some of which are already present in the settlement and some of which can easily be accessed by public transport. This is addressed in more detail in the site-specific section of these representations, which demonstrates clearly the sustainability both of this location and of this proposed option.

6.31 **Question 5.H: Do you agree that the only NPPF-compliant Growth Options proposed by this document are No. 3 (Disperse development across the new settlement hierarchy) and No. 5 (Disperse development across the new settlement hierarchy and also at the Garden Community/Major Urban Extension) and No. 6 (Concentrate development within existing transport corridors)? If you do not agree, what is your reasoning? Do you consider there to be any alternative NPPF-compliant Growth Options not considered by this document? If so, please explain your answer and define the growth option.**

6.32 Richborough Estates considers that Growth Options 2, 3 and 5 are compliant with the NPPF.

6.33 Option 1 would lead to an unbalanced strategy which limits the ability of smaller settlements to adapt and change, potentially having a negative impact upon their sustainability.

6.34 Option 2 would allow for a range of sites to be identified within the Local Plan across a wide geographical area. This would be further increased through the support of local communities in the preparation of Neighbourhood Development Plans where local, organic growth would be supported.

6.35 Option 3 would disperse development to a range of settlements allowing for a balanced spatial strategy which helps deliver growth across towns and villages to meet both strategic and more localised needs.

- 6.36 Option 4 would again potentially lead to an unbalanced strategy although the principle of garden communities in the correct location as part of the spatial distribution is supported.
- 6.37 Option 5 replicates Option 3 with the additional inclusion of a new Garden Community, the consideration of which complies with NPPF paragraph 72.
- 6.38 Option 6 seeks to maximise the benefit of the existing transport network and other infrastructure, however, Richborough Estates propose that this is likely to lead to undesirable ribbon development.
- 6.39 Richborough Estates consider the most appropriate and balanced approach to distributing growth to be Option 2, 3 or 5.

Question 5.I: Do you think that it is appropriate, in order to take the development pressures off the existing settlements in the Settlement Hierarchy, that at least one Garden Community should be incorporated into the New Local Plan? Please explain your answer.

- 6.40 With regard to the delivery of at least one Garden Community, the principle of this is supported as this complies with paragraph 72 of the NPPF. It is important that the right Garden Community is selected however, to maximise opportunities from existing services, facilities and connections rather than requiring large amounts of new infrastructure.

Question 5.J: What combination of the four factors:

- 1. Growth Options Scenario (A, D, E, F, G)**
- 2. Partial Catch Up**
- 3. Discount/No discount**
- 4. No Garden Community/Major Urban Extension**

Should Stafford Borough Council put forward as its Preferred Option at the next stage of this Plan-Making process? Please explain your answer.

- 6.41 In light of the economic growth aspirations of the Borough and the affordable housing need, Richborough Estates considers Growth Option Scenario F is the most appropriate option.

- 6.42 Richborough Estates supports the approach to partial catch-up in respect of headship rates to ensure past household suppression is not forecast into the future.
- 6.43 Richborough Estates recognises that a committed supply of housing land will play a role in meeting the housing requirement between 2020 and 2040, however it will be necessary for the Council to ensure robust scrutiny of this supply and subject any uncommitted housing allocation to the same assessment as alternative site options through the plan-making process.
- 6.44 Richborough Estates does not consider it is absolutely necessary for the Council to rely on the delivery of a new Garden Community to meet an appropriate housing requirement for the Borough. If a Garden Community is incorporated within the spatial development strategy further flexibility should be provided within the planned supply to take account of the increased risks of delivery. Delivery assumptions should be realistic.

Question 5.L: Do you agree that the assumptions made in the EDHNA about the need to replace future losses of employment land are reasonable? If not, please explain why.

- 6.45 Richborough Estates agrees with an assumption being incorporated within the EDHNA to take account of future losses of employment land.

Question 5.M: Should the New Plan broadly mirror the spatial distribution of new employment prescribed by the current Plan? If not, what would you suggest and on what basis?

- 6.46 Richborough Estates consider housing growth and jobs growth are intrinsically linked. To ensure balanced and sustainable communities, housing growth should be focused to locations where job opportunities are present, having regard to not only planned employment allocation, but existing employment generating uses. Gnosall has easy access to such opportunities both locally and via sustainable transport links.

Question 5.O: Are there any sites over and above those considered by the SHELAA that should be considered for development? If so please provide details via a "Call for Sites" form.

- 6.47 Richborough Estates has submitted information in respect of land at Horseshoe, Audmore, Gnosall through the "Call for Sites" process.

7. DELIVERING HOUSING

- 7.1 Section 8 of the consultation document considers housing delivery, recognising that the provision of a housing market which reflects the needs of all members of the community is a key objective of plan making.
- 7.2 Richborough Estates seeks to raise a number of views in respect of housing delivery which are intended to be helpful in guiding policy.

Question 8.A: Should the Council continue to encourage the development of brownfield land over greenfield land?

- 7.3 Whilst the NPPF at paragraph 117 requires strategic policies to "*set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land*" it falls short of requiring a brownfield first policy. The plan-making process must recognise the importance of identifying greenfield sites to ensure an appropriate housing requirement can be met within the Plan period and to ensure the Local Plan is deliverable. This is highlighted by the Council's Brownfield Register which identifies brownfield sites that could yield approximately 800 dwellings, noting that these are all consented.

Question 8.B: Do you consider that the enforcement of minimum density thresholds would have a beneficial impact on development within the Borough? If so do you consider the implementation of a blanket density; or a range of density thresholds reflective of the character of the local areas to be preferable? Why do you think this?

- 7.4 Richborough Estates supports the efficient use of land, in accordance with National Planning Policy and Guidance, however, the introduction of a Borough-wide minimum density standard is not supported. Instead, it is necessary for sites to be considered on a site-by-site basis, having regard to local character, context and other planning policy requirements or environmental designations or constraints.
- 7.5 As Stafford Borough is very diverse in terms of housing density across the Borough it is therefore considered that if density standards are incorporated within the Local Plan Review, then these should be minimum standards determined by reference to the character of the local area and the housing mix as determined by local needs. In accordance with national guidance the Council may wish to consider a variety of density standards for different locations.

Question 8.C: Do you think that any adopted minimum density thresholds should reflect the availability of sustainable travel in the area?

- 7.6 Richborough Estates recognise that it may be appropriate to adopt a higher minimum density within town centre locations, where the opportunities to access sustainable travel options is most prevalent.

Question 8.D: Do you consider that the adoption of the Nationally Described Space Standards would work to increase housing standards and therefore enhance the health and wellbeing of local residents in Stafford Borough?

- 7.7 Richborough Estates supports the provision of a range of dwelling types to assist in the provision of attractive and sustainable developments and to assist in contributing towards a balanced housing market.

Question 8.E: In the New Local Plan should the Council:

- a) Apply the Nationally Described Space Standards to all new dwellings, including the conversion of existing buildings?**
- b) Only apply the Nationally Described Space Standards to new build dwellings?**
- c) Not apply the Nationally Described Space Standards to any development?**

- 7.8 Richborough Estates maintains a position that the acceptability of dwelling design and provision of external spaces should be considered on a site-by-site basis.

- 7.9 The NDSS was published by the Department of Communities and Local Government on 27 March 2015. Its publication was accompanied by a Planning Update issued as a Written Ministerial Statement to Parliament by the Rt. Hon. Sir Eric Pickles MP on 25th March 2015.

- 7.10 In introducing the standards, the Written Ministerial Statement outlines:

'New homes need to be high quality, accessible and sustainable. To achieve this, the government has created a new approach for the setting of technical standards for new housing. This rationalises the many differing existing standards into a

simpler, streamlined system which will reduce burdens and help bring forward much needed new homes.'

- 7.11 However, the Written Ministerial Statement is also clear that the standards are optional, and that compliance cannot be required outside of a relevant current Local Plan policy:

'From 1 October 2015: Existing Local Plan, neighbourhood plan, and supplementary planning document policies relating to water efficiency, access and internal space should be interpreted by reference to the nearest equivalent new national technical standard. Decision takers should only require compliance with the new national technical standards where there is a relevant current Local Plan policy.'

- 7.12 This is to ensure that the need for the application of the standards through planning policy is fully evidenced and that the impact on viability is considered alongside all of the other policies contained in the Plan:

'The optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the National Planning Policy Framework and Planning Guidance.'

- 7.13 The reference to the National Planning Policy Framework relates to paragraph 174 which states:

'Local planning authorities should set out their policy on local standards in the Local Plan, including requirements for affordable housing. They should assess the likely cumulative impacts on development in their area of all existing and proposed local standards, supplementary planning documents and policies that support the development plan, when added to nationally required standards. In order to be appropriate, the cumulative impact of these standards and policies should not put implementation of the plan at serious risk, and should facilitate development throughout the economic cycle. Evidence supporting the assessment should be proportionate, using only appropriate available evidence.'

- 7.14 The reference to the National Planning Guidance relates to the following:

'Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:

- *need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.*
- *viability – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.*
- *timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.’*

7.15 The Guidance is therefore clear that the application of the NDSS requires a Local Plan policy which has been fully evidenced, including identification of need and the consideration of any impact on viability. If the Council were to consider introducing such a requirement, further evidence is necessary.

7.16 Regarding need, no justification or evidence is provided and until it is the NDSS should not be applied to any site on the premise it would be unsound. Richborough Estates consider there is unlikely to be any local circumstances within Stafford Borough that would support such an imposition of the Nationally Described Space Standards (NDSS).

7.17 Regarding viability, there is an intrinsic link between the affordability of a property and its size (in floorspace) typically expressed as a cost (£) per square metre (or square foot). Should the NDSS be implemented within Stafford Borough, the building costs would increase, and these additional costs would be offset by the increase in market value, estimated to be in the order of 10%.

7.18 Therefore, artificially increasing the floor area of properties to achieve NDSS standards would serve the purpose of ‘pricing out’ a number of potential purchasers that have a current housing need. This is despite local evidence justifying a significant affordability issue being present within the Borough.

7.19 The imposition of NDSS should not be required on any site unless it is further justified on grounds of viability.

Question 8.F: Do you consider that the housing mix detailed in the table above will be sufficient in meeting the needs of all members of the community?

- 7.20 Richborough Estates considers that it is most appropriate for housing mix to be guided by market signals, as defined within the most up-to-date assessment of needs. The assessment of needs should be routinely updated across the 20-year Plan Period. This ensures that housing mix is reflective of market-driven need.
- 7.21 Richborough Estates does however recognise the recommended range provides a good level of flexibility to allow for changing market signals across the Plan period and in different locations within the Borough. It is therefore considered sufficient in terms of ensuring the needs of all members of the community can be met.

Question 8.G: Do you consider the lack of smaller housing units to be an issue within the Borough of Stafford? If so, are there any areas where this is a particular problem?

- 7.22 Richborough Estates considers the existing housing stock within Gnosall to be balanced however recognises the current demand for smaller 2 and 3 bed properties across the Borough.

Question 8.H: Should the Council consider a policy requiring 10% of affordable homes delivered on new major development sites to be wheelchair accessible?

- 7.23 If the Council wishes to adopt the higher optional standards for Part M Category 2 and 3 then this should only be done in accordance with the NPPF (para 127f & Footnote 46). The Written Ministerial Statement (WMS) dated 25th March 2015 stated that "*the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG.*" Richborough Estates considers that this suggested policy requirement has not been justified by the evidence base available at present.

Question 8.I: Should the Council consider a policy requiring bungalows to be delivered on all major developments? If so, should there be a minimum number or proportion of such bungalows for each development? Should the amount of land required for such bungalows be reduced be either limiting their garden size or encouraging communal/shared gardens? Is

**there a need for bungalows to be delivered in both urban and rural areas?
Are there any other measures the Council should employ to meet the
demand for specialist housing within the Borough of Stafford?**

- 7.24 It is considered that the need to deliver specialist housing, including bungalows, should be guided by demand and market signals, through an up-to-date evidence base. It would be inappropriate to impose a Borough-wide percentage provision for bungalows, the demand for which varies geographically.
- 7.25 If bungalows are to be provided within a scheme, it would seem logical to reduce garden sizes or allow for the provision of communal/shared gardens to ensure efficient use of land and to reflect any desire from the market for low-maintenance external amenity areas. This approach is also likely to align to any appropriate space about dwellings requirements which should reduce the necessary distance between principal facing windows for ground floor windows, where intervening boundary treatments would interrupt views.

**Question 8.J: Do you consider that there is no need for additional provision
of student accommodation within the Borough?**

- 7.26 Richborough Estates has no view on whether additional provision for student accommodation is required, however, any provision should not contribute towards the annual housing requirement.

**Question 8.K: Do you consider an affordable housing provision of between
252 and 389 units per annum to be achievable? In the instance whereby a
lower provision of affordable housing is sought, would the supplementary
supply of a diverse range of market housing in accordance with the
findings of the EDHNA be sufficient?**

- 7.27 The level of affordable housing provision that is achievable will be intrinsically linked to the annual housing requirement established through the Local Plan review and overall plan viability having regard to all other policy requirements sought.
- 7.28 Utilising the highest annual requirement of 746 dwellings per annum set out in Scenario F, the affordable housing requirement would represent between 34% and 52% of all homes delivered. Based upon the annual housing requirements set out through the EDHNA, Richborough Estates consider that an affordable housing provision of 389 per annum is unachievable. It is also relevant that the highest level of annual affordable homes delivered within the Borough through the current

Plan period equated to 343 dwellings in 2016/17 based on a total of 1,010 dwellings (34% of all completions).

- 7.29 Richborough Estates is of the opinion that a target of 252 affordable homes per annum is only like to be achievable if a housing requirement in line with Scenario F, as a minimum, is pursued. This would require a continuation of an affordable housing requirement of between 30% and 40% on qualifying sites and this would need to be balanced with other policy requests through an assessment of viability.

Question 8.M: In order to help maintain the potential supply of land for rural affordable housing should the Council, where development has not yet commenced, convert existing Rural Exception Site Planning Permissions to Rural Affordable Housing Site Allocations?

- 7.30 The NPPF defines Rural Exception Sites as "*small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection.*" As these sites represent sites that would not normally be used for housing, in the large part due to the sustainability of locations, and represent sites that should not be relied upon in meeting the overall housing requirement, Richborough Estates consider an approach to convert these permissions to site allocations through the Local Plan to be unsound. The suitability and deliverability of these unimplemented permissions should be subject to the same level of scrutiny and assessment as all other reasonable sites contained within the SHELAA, having regard to the spatial development strategy.

Question 8.N: Should the Council introduce a policy requiring all new developments with a site capacity of over 100 dwellings to provide 5% of those plots as serviced plots available for self and custom build homes? Should the Council allocate plots for the purpose of self-build throughout the Borough?

- 7.31 In terms of the requirement for all major housing development proposals to provide evidence that they have fully considered the provision of self/custom build within the overall housing mix on site, from an urban design/ masterplanning perspective, the integration of a number of self builds into a scheme being delivered by a volume housebuilder (that often work on standard house types) would possibly be difficult to achieve in respect of both making an efficient use of land; and to achieve design

consistency. Further, sites currently being put forward by developers have been negotiated on the basis of existing planning policies and values and such an addition could impact on viability. It is recommended that further work be commissioned in order to find out where households would like to have the opportunity to undertake a self and custom build, so that the planning policies can better provide for the need rather than simply asking developers of all large sites to offer land.

- 7.32 In addition, the Council's own evidence base does not appear to fully justify a need for self/custom build properties to be considered on all sites over 100 dwellings. In October 2019 only 45 people had registered. This evidence does not support the Council's suggested approach.
- 7.33 A key priority of the Government is to boost the supply of housing by a variety of means to meet the varied housing needs of people across the UK. Self-build and custom housebuilding have been identified as a significant element of the Government's agenda to increase housing supply. The NPPF gives explicit support to policies which would plan for a mix of housing based on the needs of different groups in the community, including people wishing to commission or build their own homes. In addition, paragraph 61 of the NPPF sets out that Local Planning Authorities (LPAs) have a duty to assess the local demand for self-build plots and must also make provision for that demand.
- 7.34 With regard to facilitating the provision of self-build and custom build housing within Stafford Borough, the identification of specific sites for such development is favoured, as this option would have a greater chance of ensuring that the needs of local people wishing to build their own homes are met. It is recommended that these sites are specifically allocated as self-build/custom build housing sites within the Local Plan Review document.

8. DELIVERING QUALITY DEVELOPMENT

- 8.1 Section 9 of the consultation document relates to the quality of development. Richborough Estates seeks to provide views in respect of blue and green infrastructure, landscape and general design guidance.

Question 9.A: Should the Council have a separate policy that addresses Green and Blue Infrastructure? Identify specific opportunities for development opportunities to provide additional green infrastructure to help provide the “missing links” in the network?

- 8.2 The importance of green and blue infrastructure is, unquestionably, important in delivering good design and ensuring that it reaches beyond the site linking to areas beyond. However, caution should be exercised in being too prescriptive as sites and their contexts will vary. Notwithstanding this, it is important that opportunities for linkages are maximised and clearly articulated, through an evidence-based approach which is then clearly shown on a policies map to provide certainty.

Question 9.B: How should plan policies be developed to seek to identify opportunities for the restoration or creation of new habitat areas in association with planned development, as part of the wider nature recovery team?

- 8.3 Policies must be prepared in conformity with the NPPF, paragraph 174 which states that plans should:
- A. identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation and;
 - B. promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

Question 9.C: Should the new Local Plan continue to protect all designated sites from development, including maintaining a buffer zone where appropriate? Encourage the biodiversity enhancement of sites through

development, for example, allocating sites which can deliver biodiversity enhancements? Require, through policy, increased long-term monitoring of biodiversity mitigation and enhancement measures on development sites?

- 8.4 Paragraph 175 of the NPPF sets out the approach for considering planning applications in the context of habitats and biodiversity so the Local Plan must conform to this. It should be borne in mind that well designed developments can enhance biodiversity so the policy should contain wording which allows this to happen.

Question 9.D: How should plan policies have regard to the new AONB Management Plan and Design Guidance?

- 8.5 Where relevant, the Local Plan should contain a clear hook to the AONB Management Plan. However, the Management Plan has a different legal status, therefore any policies which are to be drawn through which would be used in the setting of Local Plan policy or used as a material consideration in the determination of planning applications should be made very clear so that they can be consulted upon through the Local Plan process.

Question 9.E: Do you consider that the described approach will achieve the Council's ambition of maintaining and increasing tree cover within the Borough? Are there any further measures which you think should be adopted to further enhance these efforts?

- 8.6 This approach is supported.

Question 9.F: Should the Council consider a policy requirement that new development take an active role in securing new food growing spaces? If yes, are the following measures appropriate?

- a) **Protecting and enhancing allotments, community gardens and woodland;**
- b) **Supporting food growing, tree planting and forestry, including the temporary utilisation of cleared sites;**
- c) **Requiring major residential developments to incorporate edible planting and growing spaces;**
- d) **Ensuring landscaping is flexible so that spaces may be adapted for growing opportunities.**

- 8.7 This approach is supported in principle but should not be used to preclude or block development, but to help inform good design which incorporates applicable elements as set out above. Furthermore, monitoring will be essential as evidence of demand will be needed to inform local specifics for example whether there is need for allotments (local waiting lists or underused plots for instance).

Question 9.G: Should the new Local Plan set out specific policies to require new development to minimise and mitigate the visual impact that it has on the Character Areas and quality of its landscape setting?

- 8.8 Provided that the context is clearly justified it would be sensible and appropriate to include positively worded policies which would require an LVIA to accompany and inform development proposals; unless they were part of an allocated site and then potentially only a LVA would be required as those sites will have already been tested through the Local Plan Examination in Public.

Question 9.H: Do you consider there are areas in the Borough that should have the designation of Special Landscape Area? If so, explain where.

- 8.9 Case law has considered the issue of landscape value and what it means for a landscape to be valued. *Stroud DC vs. SSCLG [2015] EWHC 488 (Admin)* is clear that, whilst valued landscapes do not need to have a formal designation, 'valued' means something more than just 'popular'. Landscape is only 'valued' if it has physical attributes which take it out of the ordinary.
- 8.10 The Landscape Institutes' Guidelines for Landscape and Visual Impact Assessment ('the GLVIA') identifies various factors that may be relevant in the assessment of landscape value, including:
- Condition/Quality,
 - Scenic Quality,
 - Rarity and Representativeness,
 - Conservation Interests,
 - Recreation Value,
 - Perceptual Aspects; and

- Cultural Associations.

8.11 Richborough Estates considers that further evidence is required if further designations are sought to determine landscape is 'special' or 'valued'. This should be evidenced having regard to the above criteria.

Question 9.J: Do you consider that the current "Design" SPD provides sufficient guidance for design issues in the Borough? Please explain your rationale.

8.12 The Design SPD is considered to provide sufficient guidance however, Richborough Estates considers this should be updated to reflect the National Design Guide, published in October 2019.

Question 9.L: To support a new Local Design Review Panel should the new Local Plan:

- a) Require complex or Large-Scale development to be subject to review by a Regional Expert Design Panel, to form a material consideration in the planning decision?**
- b) To adopt (and commit to delivering), nationally prescribed design standards e.g. Manual for Streets, Building for Life, BRE Homes Quality Mark etc**
- c) Reconsider and update local design policies to more robustly reflect current national best practice, be based upon local Characterisation studies, and be specifically aligned with related and companion policy areas to support the wider spatial vision for the Borough.**

8.13 Richborough Estates considers if particular standards are already required at the national level there is no need to reiterate them locally as it is better to refer to them via a general policy hook, which would then be more flexible if the national context changes.

8.14 In relation to design and sustainability standards, it is acknowledged that the Code for Sustainable Homes has been withdrawn by the UK Government. However, it is noted that the BREEAM sustainability assessment can still be used, for new residential, as well as other buildings. In light of the fact that there is no mandatory requirement for many of the identified standards it is considered that this should be left to the discretion of the developer, rather than included within local planning policy. Indeed, as Paragraph 150 b) of the NPPF states, any local requirements for

the sustainability of buildings should reflect the Government's policy for national technical standards.

- 8.15 In respect of a design review panel, it is not considered their opinion can be used as a material consideration in the determination of a planning application. It is not unusual for design policies to be interpreted in different ways but still arriving at an effective design solution which is policy compliant. Even if a design review panel disagree with a development proposal, that does not mean it is an inappropriate from of development if it satisfies the design policies.

Question 9.M: Do you consider the designation of sites as Local Green Space to be necessary through the new Local Plan?

- 8.16 Richborough Estates considers that it is not necessary to designate Local Green Spaces through the new Local Plan. As these spaces are "*green areas of particular importance to local communities*" (ID: 37-005) it may be more appropriate to allow identification through the Neighbourhood Planning process.
- 8.17 In determining Local Green Spaces, regard must be had to the spatial development strategy to ensure they would not undermine the Local Plan's aim to "*identify sufficient land in suitable locations to meet identified development needs*" (ID: 37-007).

Question 9.N: Do you believe that there are areas within Stafford Borough that are poorly served by public open space. If so where? Are there any other Borough-wide facilities you feel should be associated with open space? Are there any settlements that you believe are lacking in any open space provision? Should the Council seek to apply Play England standards to new housing developments? Should the Council seek to apply Fields in Trust standard to providing sports and children's facilities? Should the Council seek to apply Natural England's ANGSt to new development? Should the Council seek to develop a bespoke standard in relation to open and/or play space? Do you consider that developments over 100 houses should incorporate features that encourage an active lifestyle for local residents and visitors? Do you consider that developments over 100 houses should provide direct connections from the development to the wider cycling and walking infrastructure? Should the Council require all high density schemes to provide communal garden space?

8.18 Richborough Estates considers that policy must be capable of being flexible to support the local context. Thresholds seem rather arbitrary and therefore Richborough Estates suggest it would be more appropriate to ensure that developments are prepared in line with a design framework; one which references good practice and guidance which may well be subject to change throughout the Plan period.

Question 9.0: Should the Council seek to designate land within the new Local Plan 2020-2040 to address Borough-wide shortage of new sporting facilities? Identify within the new Local Plan the site in which a new swimming pool should be developed?

8.19 Richborough Estates consider all policies and proposals will need to demonstrate deliverability, and any future requirements will need to be justified in order to provide certainty in terms of compliance with Regulation 122 of the CIL Regulations and the need for developer contributions should these be required. Further evidence will be required in respect of new sporting facilities as the plan progresses and this should be informed by any corporate strategy prepared by the Borough Council.

9. ENVIRONMENTAL QUALITY

9.1 Chapter 10 focuses upon environmental quality including air quality, noise and light pollution, and the management of waste.

Question 10.A: The currently adopted Plan for Stafford Borough does not include any policies aiming to increase air quality levels. The new Local Plan provides an opportunity to amend this. Therefore, should the Council:

- a) **Ensure the installation of infrastructure to support the transition from petrol and diesel to electric powered vehicles on every major development?**
- b) **Ensure all major development is accessible by regular public transport?**
- c) **Enforce Air Quality Management Zones around areas of notable biodiversity importance?**
- d) **Employ any further methods which you consider will aid in the improvement of air quality within the Borough?**

9.2 In terms of ensuring the installation of infrastructure to support the transition from petrol and diesel to electric powered vehicles, it is considered that more evidence is required. Whilst the principle is supported by Richborough Estates, and local plan policies can provide the context for supporting such change, this will also depend on further detail: for example is the infrastructure appropriate; can the grid support capacity in the area being developed; and, what is the impact upon viability and deliverability?

9.3 In terms of Air Quality Management Zones, again it is considered that further evidence is required. This evidence should consider the potential impact upon sites of biodiversity (given that these will vary) and whether such zones would achieve proposed outcomes.

Question 10.B: The currently adopted Plan for Stafford Borough does not enforce any policy to mitigate for the impact of NO₂ particles on internationally designated sites. Therefore should the Council enforce a scheme whereby any development likely to result in an increase of NO₂ deposition on these sites in Stafford Borough must contribute to a mitigation programme?

9.4 Again, Richborough Estates consider further evidence is required to show what the impact is likely to be and whether this impact arises as a consequence of proposed development (in order to justify the need for mitigation). Any mitigation strategy would also need to consider the effect upon Plan viability.

Question 10.C: The currently adopted Plan for Stafford Borough makes reference to waste management in Policy N2. However, the growing population of Stafford Borough and the need for further action to combat climate change suggests the employment of further, more stringent measures encouraging sustainable waste disposal is desirable. Therefore, should the Council:

- a) Consider a policy requiring all major developments to detail how they will provide infrastructure facilitating recycling and composting on site?**
- b) Require developers to submit a strategy for how they will dispose of waste in a sustainable manner throughout the construction phase of development?**
- c) Employ any further measures to increase the sustainable and efficient disposal of waste in Stafford Borough?**

9.5 Richborough Estates considers that much more detail is required, particularly as this potentially overlaps with the role of the County Council and the Waste Local Plan, which itself is also part of the Development Plan. The current Waste Local Plan, covering the period 2010 - 2026 was adopted in 2013 and was reviewed in 2018. It is due for a further review in 2023, 'unless an earlier review is deemed necessary due to significant changes in national policy and guidance, local circumstances or our strategic priorities'. The new Local Plan for Stafford Borough needs to ensure it is in conformity with the Waste Local Plan otherwise considerable confusion and uncertainty will arise.

10. LAND AT HORSESHOE, AUDMORE, GNOSALL

10.1 Richborough Estates is promoting Land at Horseshoe, Gnosall, for residential development. It is anticipated that the site can accommodate a minimum of 55 dwellings although it should be noted that larger schemes within this site have been pursued previously with no technical reasons for refusal. A Site Location Plan and Indicative Masterplan for approximately 55 dwellings are included at **Appendix 1** and **Appendix 2** to this representation accordingly.

The Site

10.2 The site comprises approximately 5.57 hectares of land, located to the north-eastern edge of Gnosall. The site is currently in agricultural use.

10.3 The site comprises two improved pasture fields separated by a mature hedgerow. The perimeter of the site is also bounded by mature hedgerows, with some garden fences. There are several trees scattered within the existing hedgerow.

10.4 Approximately half the site is bounded by a single carriageway highway which is known locally as the Audmore Loop or Horseshoe. The remainder of the site is either adjoining existing residential development or pasture land.

The Surrounding Area

10.5 Approximately two thirds of the site borders existing housing. The majority of this is to the west and southwest centred around Glebe Lane and adjacent roads. Much of this housing was constructed on greenfield land, principally built in the 1970s and 1980s. The housing in this area is typically of that era with the majority being detached or link-detached properties.

10.6 Adjoining the northern edge of the site there is a mix of older properties and more modern bungalows interspersed with a small level of new build properties. There are also a handful of farm buildings associated with Audmore Farm.

10.7 Beyond the immediate surrounding properties to the north lies open countryside. There is also open countryside beyond the site's eastern and southern boundaries.

Sustainable Travel

10.8 There are a range of local facilities near to the site.

10.9 Gnosall benefits from a wide range of services and facilities. The services and facilities listed below are located within 1.5km of existing residential properties and the proposed development site, which is well below recommended maximum acceptable walking distances for common trip purposes:

- Medical facilities
- Educational facilities
- Convenience store
- Post Office
- Local Bus Services
- Library facilities
- Formal and informal plays areas and sports pitches
- Community buildings, including village hall
- Churches
- Pubs and restaurants
- Petrol Station

10.10 It is generally accepted that a walking distance of up to 2km to jobs and schools and 1.2km to other locations (such as local shops) is sustainable and acceptable. Given the distances referred to above, it is therefore considered that the site is sustainably located.

10.11 The site benefits from genuine opportunities to utilise sustainable transport modes, including a twice-hourly bus service between Telford and Stafford town centre, with the nearest stops located approximately 300m from the site.

Access

10.12 Initial highways consideration confirms that a safe and suitable access can be provided to the site via T-junction from Horseshoe. Additionally, the existing public right of way can be retained and incorporated into the site layout, as well as new internal footpath connections.

Flood Risk and Drainage

- 10.13 Based on the Environment Agency's Flood Map for planning, the site is shown to be located within Flood Zone 1; land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%), and therefore is suitable for residential development.
- 10.14 The site is capable of being development in such a way so as to not increase the risk of flooding associated with surface water run-off. Any development would incorporate SuDS in accordance with Local Plan Policy N2 and include an additional 30% allowance to accommodate the effects of climate change.

Indicative Proposal

- 10.15 To accompany these representations, an indicative masterplan has been prepared, including at **Appendix 2**. This has been prepared having regard to existing constraints, as well as relevant planning policy and guidance.
- 10.16 The indicative masterplan identifies the following key features:
- Delivery of a minimum of 55 dwellings, provided at a gross density of 9.87 dwellings per hectare (24.2 dwellings per hectare net);
 - Access from Horseshoe;
 - 3.3 Ha of public open space, including provision of a community green and retaining existing vegetation wherever possible; and
 - Attenuation pond to western edge of site.
- 10.17 The layout has been designed so as to include extensive areas of public open space throughout the site, reflective of the character of the site on the edge of the settlement, assisting with the transition to the open countryside. Blocks have been orientated to create a soft edge to the development. Creating a positive interface between the proposed development and the surrounding countryside.
- 10.18 Additionally, the layout seeks to retain and supplement existing vegetation wherever possible, including the existing hedgerow to the southern edge of the site which would be retained, in addition the hedgerow which bisects the centre of the site. This will allow for considerable levels of habitat and buffer planting to help support local wildlife and reduce the visual impact of the proposed development. A

community green is also provided to the south-western corner of the site, for use by both existing and future residents of Gnosall.

- 10.19 This layout ensures the most efficient use of the site area, whilst retaining natural features of value, without compromising the visual amenity of the wider area when viewed from the surrounding countryside.

Suitability

- 10.20 The indicative masterplan demonstrates how a scheme for a minimum of 55 dwellings can be achieved having regard to development design guidelines and development standards currently utilised by the Council. The proposal is sustainable and represents a logical extension to the settlement of Gnosall.

Deliverability

- 10.21 Further technical work can be commissioned to further demonstrate the deliverability of this site. However, initial technical work in relation to the key disciplines undertaken to date confirms there are no constraints likely to render the site undeliverable in the Plan period. The site is available now.
- 10.22 There are no existing uses that would require relocation and no issues of contamination that would require remediation.
- 10.23 The site is deliverable and immediately available and, subject to allocation, could deliver homes and associated community benefits within the next 5 years.

11. CONCLUSION

- 11.1 Richborough Estates supports Stafford Borough Council's decision to commence a review of the Local Plan. This provides an opportunity for the Council to comprehensively review the vision, strategic objectives, development requirements, spatial development strategy and policies for shaping detailed development proposals.
- 11.2 In respect of the vision and objectives, Richborough Estates considers that the review should seek to distil elements of the current vision and objectives that remain relevant to the Borough, into a concise overview of change sought to 2040.
- 11.3 In respect of emerging policy choices, it is recognised by Richborough Estates that further evidence will be required to support policy requirements and that elements of this further evidence will form an iterative part of the plan-making process to respond to the emerging growth requirements and spatial development strategy.
- 11.4 In respect of housing growth Richborough Estates considers Growth Option Scenario F is the most appropriate option. This scenario aligns to the economic growth aspirations of the Borough and the affordable housing need set out in the EDHNA. As part of this requirement Richborough Estates supports the approach to a partial catch-up in respect of headship rates to ensure past household suppression is not forecast into the future.
- 11.5 Richborough Estates recognises that an existing committed supply of housing land will play a role in meeting the housing requirement between 2020 and 2040, however it will be necessary for the Council to ensure robust scrutiny of this supply and subject any uncommitted housing allocation to the same assessment as alternative site options through the plan-making process.
- 11.6 With regard to the delivery of at least one Garden Community, the principle of this is supported by Richborough Estates as this complies with paragraph 72 of the NPPF. It is important that the right Garden Community is selected however, to maximise opportunities from existing services, facilities and connections rather than requiring large amounts of new infrastructure. If a Garden Community is incorporated within the spatial development strategy further flexibility should be provided within the planned supply to take account of the increased risks of delivery. As such Richborough Estates supports the pursuit of Growth Options 2, 3 or 5 as representing the most appropriate distribution of housing growth to 2040, with an amendment to allow communities to bring forward additional growth where

this would be supported locally through a Neighbourhood Development Plan. This approach would ensure all communities have the ability to meet housing needs in line with national guidance.

- 11.7 Land at Horseshoe, Audmore, Gnosall is promoted by Richborough Estates as a suitable and sustainable location for residential development, representing a deliverable proposition, being available now and providing every prospect that a minimum of 55 homes can be delivered within the plan period. The site is aligned to the various spatial development strategy options being considered by the Borough Council and would assist in delivering an appropriate housing requirement and supporting the economic aspirations of the Borough.

APPENDIX 1

SITE LOCATION PLAN



SITE LOCATION
13.77 ACRES/ 5.57 HECTARES

LAND AT HORSESHOE, AUDMORE, GNOSALL

SITE LOCATION PLAN

REVISION A: 13.10.2014
RED LINE BOUNDARY UPDATED IN ACCORDANCE
WITH DWG/BIR.4423_17A

T 0121 308 9570 | F 0121 323 2215 | www.pegasuspg.co.uk | Team: CJL | Date: 08.10.2014 | Scale: 1:1250:@ A3 | drwg: BIR.4423_17A | Client: RICHBOROUGH ESTATES LTD |



APPENDIX 2

INDICATIVE MASTERPLAN



- KEY PRINCIPLES**
1. Proposed access off Horse Shoe;
 2. Audmore community green; multi functional area of public open space;
 3. Principal street maintaining southerly views towards St Lawrence church;
 4. Greater building separation distances, longer rear gardens and provision of lower storey massing;
 5. Retention of existing Public Right of Way;
 6. Focal point dwellings to ends of vistas;
 7. Streets and courts with outward facing views to achieve visual connections with context;
 8. Soft landscaped green edge retaining existing hedgerow;
 9. Green ecological corridor retaining and supplementing existing hedgerow;
 10. Active housing frontage providing natural surveillance of public open spaces;
 11. Soft development edge to address interface of landscape and urban settings meeting; and
 12. Central street with verge.

	SITE LOCATION 5.83 HECTARES 14.406 ACRES		STORM WATER ATTENUATION (SWALE, POND + DITCHES)		NEW TREES AND HEDGEROWS		NEW FOOTPATHS		PUBLIC OPEN SPACE
	EXISTING TREES		NEW RESIDENTIAL DEVELOPMENT		EXPUBLIC RIGHT OF WAY		GREEN LINK TO PROW		INDICATIVE CONTEXTUAL LANDSCAPE



LAND AT HORSESHOE, AUDMORE GNOSALL
PROPOSED INDICATIVE MASTERPLAN

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**New Stafford Borough Local Plan 2020-2040
 “Issues and Options” Consultation - Response Form**

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent’s Details (if applicable)
Title		Mr
First Name		Neil
Surname		Cox
E-mail address		
Job title (if applicable)		Director
Organisation (if applicable)	Richborough Estates	Pegasus Group
Address		
Postcode		
Telephone Number		

Thank you for taking the time to provide your comments on the “Issues and Options” document for the Stafford Borough Local Plan 2020-2040. All comments will be considered when preparing the Preferred Options for the New Local Plan.

Please return this form either by email (preferred) to: forwardplanning@staffordbc.gov.uk

or by post to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ

Please ensure receipt by Stafford Borough Council **by 12.00 noon Tuesday 31 March 2020.**

For advice on how to respond to the consultation and how to fill in this form, please see the Consultation Guidance Notes on the Council’s website at: www.staffordbc.gov.uk/new-local-plan- or call 07800 619636 / 07800 619650.

Please note:

- Comments must be received by 12noon on Tuesday 31 March 2020. Late comments will be considered “not duly made” under the Regulations;

- Please fill in a separate Part B for each question/paragraph/table/topic you are commenting on and, where necessary, please explain your response;
- Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.

Part B: Your Comments				
<i>Please complete a new Part B for each representation you wish to make.</i>				
Name: Neil Cox		Organisation: Pegasus Group on behalf of Richborough Estates		
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?				
Section		Paragraph		Table
Figure		Question	See attached	Other
2. Please set out your comments below				
<p>Please see attached representation structured in order of questions raised within Issues & Options consultation document.</p>				

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?				
Section		Paragraph		Table
Figure		Question		Other
2. Please set out your comments below				

Please use a continuation sheet if necessary

All comments should be made in writing preferably using this form and should be received by Stafford Borough Council **no later than 12 noon Tuesday 31 March 2020**.

You can view the documents online at www.staffordbc.gov.uk/new-local-plan-

Please e-mail your comments (Preferred) to: forwardplanning@staffordbc.gov.uk

or post your comments to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ

Thank you for taking the time to contribute to this consultation.

NEW LOCAL PLAN 2020-2040: ISSUES & OPTIONS

STAFFORD BOROUGH COUNCIL – PRIVACY NOTICE

How we will use your details

All representations received to the Stafford Borough New Local Plan 2020-2040 Issues & Options consultation document will be included in a schedule and made publicly available once the consultation has closed.

Stafford Borough Council will consider all representations received, using them to inform the next stage of the process for the New Local Plan 2020-2040.

Comments cannot be treated as confidential. Your personal information, such as your postal and email address will not be published and signatures will be redacted, but your name and organisation will be made available. We will only use your personal information to send you information on the New Local Plan and associated planning policy matters.

We believe you should always know what data we collect from you and how we use it, and that you should have meaningful control over both. As part of our ongoing commitment to transparency, and in relation to the new General Data Protection Regulations (May 2018), we have updated our Privacy Policy.

Stafford Borough Council are the data controller and you can find information about how we handle your personal data by visiting www.staffordbc.gov.uk/privacynotices and if you have any queries or would like to unsubscribe from receiving information then please contact forwardplanningconsultations@staffordbc.gov.uk

STAFFORD BOROUGH LOCAL PLAN 2020-2040

ISSUES & OPTIONS (JANUARY 2020)

LAND AT UTTOXETER ROAD, STONE

ON BEHALF OF RICHBOROUGH ESTATES



**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**

Pegasus Group

CONTENTS:

Page No:

1.	INTRODUCTION	1
2.	CONTEXT	3
3.	EVIDENCE	4
4.	VISION & STRATEGIC OBJECTIVES	5
5.	SUSTAINABILITY & CLIMATE CHANGE	7
6.	THE DEVELOPMENT STRATEGY	9
7.	DELIVERING HOUSING	19
8.	DELIVERING QUALITY DEVELOPMENT	27
9.	ENVIRONMENTAL QUALITY	33
10.	LAND AT UTTOXETER ROAD, STONE	35

APPENDICES:

APPENDIX 1: SITE LOCATION PLAN

APPENDIX 2: INDICATIVE MASTERPLAN

1. INTRODUCTION

- 1.1 These representations are made by Pegasus Group, on behalf of Richborough Estates in response to the Stafford Borough Local Plan Review (2020 – 2040) 'Issues and Options Consultation Document February 2020.' These representations relate to land at Uttoxeter Road, Stone. A site plan is attached at **Appendix 1**. The site lies within SHELAA Ref. ST006.
- 1.2 Richborough Estates has land interests at Uttoxeter Road, Stone. Their interests comprise of approximately 4.56ha of land adjoining the south-eastern edge of Stone, Staffordshire, which is currently used for agricultural purposes.
- 1.3 The site has the capacity to deliver approximately 85 new homes as part of a carefully considered housing development and publicly accessible open space. An indicative masterplan is attached at **Appendix 2**.
- 1.4 These representations respond to the 'Issues and Options' consultation document and accompanying published evidence, having regard to the national and local policy context. Where appropriate, Richborough Estates provide a response to the specific questions set out within this document.
- 1.5 The representations are framed in the context of the requirements of the Local Plan to be legally compliant and sound. The tests of soundness are set out in the National Planning Policy Framework (NPPF), paragraph 35. For a Plan to be sound it must be:
- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

1.6 The representations also give consideration to the legal and procedural requirements associated with the plan-making process.

2. CONTEXT

- 2.1 Richborough Estates supports Stafford Borough Council's decision to commit to a review of the adopted Stafford Borough Local Plan. This provides an opportunity for the Council to comprehensively review the vision, strategic objectives, development requirements, spatial development strategy and policies for shaping detailed development proposals.
- 2.2 The most recent National Planning Policy Framework (NPPF) (February 2019) requires local planning authorities to keep their Local Plan up to date by undertaking a review at least every five years. The proposed timescales, as set out within the Local Development Scheme, will ensure that an up to date Local Plan for the Borough will be in place to support growth and meet future development needs.
- 2.3 The Local Plan Review is necessary in order to respond to the need for continued growth within the Borough to 2040 and to ensure consistency with national policy and guidance.
- 2.4 The Issues and Options consultation follows previous Issues consultation, which scoped issues that affect the Borough, and looked at options for addressing them. The Issues document also set out a proposed new settlement hierarchy that had regard to the Settlement Assessment. The current consultation document utilises the response to the previous consultation to further explore the vision and strategic objectives to 2040 and highlights a range of growth and spatial strategy options for delivering growth within the Borough.
- 2.5 Richborough Estates supports the Council's proactive approach in continuing with a review of the Local Plan to ensure that an up to date policy framework exists within the Borough to guide growth to 2040 and to ensure that development is genuinely plan led.

3. EVIDENCE

Question 1A: Is the evidence that is being gathered a suitable and complete list?

- 3.1 The list of assessments and studies identified within the consultation document represents a suitable list, however it should be recognised that this evidence should be refreshed throughout the review process where necessary to reflect changing circumstances or guidance. In addition, Richborough Estates recognises that elements of the evidence base will need to be iterative with the emerging growth requirements and spatial distribution of growth.
- 3.2 The vision is supported by Richborough Estates and reflects the existing Vision contained within the adopted Local Plan Strategy which remains appropriate for an extended plan period to 2040.

Question 1B: Have any key pieces of evidence necessary for Stafford Borough's new Local Plan been omitted?

- 3.3 Paragraph 1.10 makes reference to an 'Infrastructure Delivery Programme' which is assumed to represent an Infrastructure Delivery Plan identifying the necessary infrastructure to support new development. Again, it is recognised that this will be refined at each stage of the plan making process being intrinsically linked to any preferred spatial strategy and the outcome of discussions through the Duty to Cooperate.

4. VISION & STRATEGIC OBJECTIVES

- 4.1 It is noted that the adopted Local Plan contains a detailed Vision and a significant number of Key Objectives. Both the Vision and Key Objectives contain a number of spatially specific elements i.e. Stafford, Stone or lower tier settlement specific elements. Richborough Estates considers it is necessary to review this approach.

Question 3.A: Do you agree that the Vision should change?

- 4.2 Richborough Estates considers that the Vision contained within the adopted Local Plan is overly protracted and fails to clearly and succinctly set out a comprehensive Vision for the Borough.
- 4.3 The Local Plan Review process provides a perfect opportunity to distil the current Vision into a locally relevant, yet Borough-wide Vision that clearly aligns to the spatial change sought in Stafford Borough to 2040.

Question 3.B: Do you agree that the Vision should be shorter?

- 4.4 Richborough Estates agrees the Vision should be shorter as set out above. This could be achieved through the removal of the sub-sections for both Stafford and Stone which would sit more usefully within a Neighbourhood Plan to be defined and refined by local communities.

Question 3.C: Do you agree that a new Vision, whilst maintaining a commitment to growth, should more explicitly recognise the need to respond to Climate Change and its consequences?

- 4.5 The 'Scoping the Issues' consultation summary contained within the current consultation document identified the support for renewable energy sources and the future proofing of new development via the use of technology as reoccurring or key responses.
- 4.6 It is recognised that Stafford Borough Council has declared a 'climate emergency' and has committed to preparing a report to set out how the Council proposes to respond. The implications of climate change for emerging policy to be contained within a new Local Plan should be informed by the Council's Climate Change Strategy/Report currently in preparation. Richborough Estates considers that any recognition of Climate Change to be incorporated within the Vision should await the outcome of the Council's corporate stance on climate change.

Question 3.D: Should the spatially-based approach to the objectives be retained? Does this spatially-based approach lead to duplication?

4.7 Richborough Estates considers the 28 key objectives contained within the adopted Local Plan to be protracted and repetitive. This is, in part, due to the spatially-based approach taken by the Borough Council previously.

4.8 In line with comments in respect of the Vision, Richborough Estates consider that the review provides an opportunity to distil elements of the current objectives that remain relevant to the Borough, into a concise set of Borough-wide objectives.

Question 3.E: Is the overall number of objectives about right?

4.9 Richborough Estates considers the list of current objectives is far too long. A shorter list of succinct, locally relevant Borough-wide objectives would provide greater clarity and understanding of the most important areas of change or protection within the Borough.

Question 3.F: Should there be additional objectives to cover thematic issues? If so what should these themes be?

4.10 Richborough Estates does not support the preparation of additional objectives, but reconsideration of the existing objectives. Updated objectives should include:

- Approach to spatial distribution of growth to support sustainable communities
- Meeting housing needs
- Economic growth requirements
- Infrastructure delivery
- Range of locally relevant thematic topics that would include climate change, centres, leisure, heritage, ecology, landscape and the creation of high-quality new development.

5. SUSTAINABILITY & CLIMATE CHANGE

Question 4.A: Efforts to increase energy efficiency within the Borough are currently detailed in Policy N2 of the adopted Plan for Stafford Borough. However, the increasing recognition that more needs to be done to mitigate the effects of climate change suggests that measures in excess of this will now be necessary. Should the new Local Plan require all developments be built to a standard in excess of the current statutory building regulations, in order to ensure that an optimum level of energy efficiency is achieved? What further policies can be introduced in the Local Plan which ensures climate change mitigation measures are integrated within development across the Borough?

- 5.1 Whilst it is commendable to deliver enhanced energy efficiency as part of a proposal, it is important that local planning policies do not accelerate beyond requirements of building regulations, particularly without evidence to support that such requirements are deliverable and will not prevent the speedy delivery of housing in accordance with the aspirations of the NPPF.

Question 4.C: Should the Council introduce a policy requiring large developments to source a certain percentage of their energy supply from on-site renewables?

- 5.2 Whilst it is commendable to deliver renewable and low carbon energy as part of a proposal, it is important that local planning policies do not accelerate beyond requirements of building regulations, particularly without evidence to support that such requirements are deliverable and will not prevent the speedy delivery of housing in accordance with the aspirations of the NPPF.

- 5.3 The ability for large developments to source a certain percentage of their energy supply from on-site renewables will need to be balanced with the burden of delivering other infrastructure requirements that will be required to support the chosen spatial strategy to ensure the delivery of sustainable communities.

Question 4.E: Should the Council implement a higher water standard than is specified in the statutory Building Regulations?

- 5.4 Whilst it is commendable to deliver water conservation and efficiency, it is important that local planning policies do not accelerate beyond requirements of building regulations, particularly without evidence to support that such

requirements are deliverable and will not prevent the speedy delivery of housing in accordance with the aspirations of the NPPF. Optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the PPG. This evidence does not appear to be present.

- 5.5 The policy approach should be informed by a Water Cycle Study to determine whether the scale, location and timing of planned development within the Borough would give rise to issues from the perspective of supplying water and wastewater services and preventing deterioration of water quality in receiving waters.

6. The Development Strategy

- 6.1 Richborough Estates supports the review of the spatial development strategy to establish the scale and distribution of new housing and employment development to 2040.

Question 5.A: Do you consider that the existing Policy SP1 addresses the requirements of the NPPF? Do you consider that it is necessary to retain this policy in light of the recent changes in Planning Inspectorate's view?

- 6.2 Policy SP1 contained within the existing Plan for Stafford Borough broadly addresses the requirements of the NPPF. It is considered appropriate to retain a policy committing the Council to applying the presumption of sustainable development within any new Plan for the Borough to 2040. The continuation of such a policy is therefore recommended by Richborough Estates.

Question 5.B: Which Annual Housing Requirement figure do you think will best meet Stafford Borough's future housing growth requirements? What is your reasoning for this answer? Should a Partial Catch Up rate allowance be incorporated? What is your reasoning for this answer?

- 6.3 The preparation of the EDHNA is noted by Richborough Estates. The approach taken in the EDHNA to consider a range of scenarios and accelerated headship rates is supported, particularly in respect of the consideration of balancing housing delivery with economic growth likely to be experienced and supported through the aspirations of the Borough.
- 6.4 Scenario A, which represents the Standard Method, relies on the SNHPs which draws from past trends.
- 6.5 The Government confirms the use of the 2014 Sub-National Household Projections to provide the demographic baseline for the assessment of housing need in the short term and the Government's intention to review the formula and consider amending the method in the longer term. The baseline figure represents a minimum figure and does not account for additional housing demand that may arise as a direct result of economic growth during the plan period. Furthermore, it does not include meeting housing needs arising from neighbouring authorities.
- 6.6 It represents a position that does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have

on demographic behaviour, including meeting cross-boundary needs. Richborough Estates therefore does not consider that this represents the most appropriate annual housing requirement for Stafford Borough.

- 6.7 Scenario's B and C represent a housing requirement that is lower than the Standard Method. There are no exceptional circumstances that can be demonstrated in Stafford Borough to justify an annual housing requirement below the Standard Method. Richborough Estates therefore consider it is appropriate for these two scenarios to be discounted.
- 6.8 Scenarios D, E, F and G apply different jobs growth assumptions. The EDHNA recognises that the *"jobs projections, modelled in PopGroup, suggest that there would have to be an uplift to the demographic baseline if the employment growth /policy-on forecasts are to be realised, ranging from 435 dpa (Scenario D CE Economic Forecasts) to 683 dpa (Scenario F Past Trends Jobs Growth). These equate to between 489 dpa and 746 dpa incorporating PCU rates."* Options D to G are the only options to require a level of housing growth similar or higher than the those set out in the current Plan for Stafford Borough.
- 6.9 Richborough Estates agrees there is a clear risk that where the labour force supply is less than the projected job growth, this could result in unsustainable commuting patterns and reduce the resilience of local businesses, resulting in a barrier to investment. In addition, if the objective of employment growth is to be realised, then it will generally need to be supported by an adequate supply of suitable housing. Jobs growth and housing growth are intrinsically linked and should be balanced to ensure a sustainable strategy to 2040.
- 6.10 Whilst COVID-19 might bring short-term economic uncertainty it has to be remembered that the Plan period is to 2040 and Government initiatives (such as furlough) are designed to try and lessen a downturn in the longer term. It should therefore not hinder the Council's future growth aspirations when looking across the Plan period to 2040.
- 6.11 Scenario D utilises the CE Baseline and represents a level of jobs growth that is significantly lower than past trends in jobs growth in the Borough and does not reflect the Council's future growth aspirations. Richborough Estates consider that this should therefore be discounted.

- 6.12 Scenario E assumes the delivery of a new Garden Community which would attract £750k of Government funding to develop detailed plans for key infrastructure such as highway improvements, schools, water and energy provision. It also assumes delivery of a major development proposal at Stafford Station. In total these proposals are assumed to create an additional 12,500 new jobs in the Borough. If both a Garden Community and the Stafford Station Gateway projects are pursued it is considered appropriate to utilise this scenario as an absolute minimum to guide the housing requirement. Despite this, jobs growth should also be considered beyond a Garden Community and the county town of Stafford.
- 6.13 Scenario F reflects the jobs growth that has been experienced within Stafford Borough in the past (2000 to 2018). The EDHNA concludes that *"it is considered, given the current economic climate, that this rate of jobs growth is unlikely and would not be able to be sustained over the Plan Period. It is recognised that the current period is one of considerable economic uncertainty, in part as a result of Brexit, and that this may change, leading to more favourable economic conditions."* Richborough Estates would disagree with this conclusion on the basis that past jobs growth included a significant period of economic uncertainty, namely a prolonged recession, and fails to take account of the 12,500 additional jobs that could be created through the Stafford Station Gateway and a new Garden Community contained within Scenario E.
- 6.14 Scenario G (CE Baseline + 50% scenario) considers an intermediate level of jobs growth between Scenario D and Scenario F, *"reflective of jobs growth associated with the development of Stafford Station Gateway but not including jobs associated with a potential New Garden Community development."* This scenario appears arbitrary in assuming that the Council's economic growth aspirations will not be met without a Garden Community and that any growth over and above the baseline would only be attributable to Stafford Station Gateway. Richborough Estates considers this approach to be flawed.
- 6.15 Richborough Estates considers that the most appropriate Scenarios are Scenario E and F. Scenario E should be utilised as an absolute minimum if a Garden Community proposal were to be pursued. In addition, Richborough Estates considers that a level of economic growth that reflects past trends jobs growth is achievable over the plan period.

- 6.16 Richborough Estates would also support the inclusion of partial catch-up rates in respect of headship rates, to ensure that household formation rates suppressed in the past are rebalanced looking to the future.

Question 5.C: In calculating the Housing Requirement figure for the New Local Plan 2020-2040 should a discount be applied to avoid double counting of new dwellings between 2020-2031? If a discount is applied should it be for the full 6,000 new homes currently accounted for in the adopted Plan for Stafford Borough or a reduced number? Please explain your reasoning.

- 6.17 The Housing Requirement figure for the New Local Plan should be expressed as a total figure without discount as the New Local Plan will replace the current Plan for Stafford Borough.
- 6.18 It is logical that existing uncommitted allocations or other sites relied upon to deliver homes by 2031 may contribute to this housing requirement. However, any existing site that is to be relied upon should be subject to the same scrutiny and assessment as any other 'reasonable option' being promoted through the Local Plan Review process. Any site deemed to be available, suitable and achievable and determined to be deliverable or developable should then inform a Borough wide trajectory for the period 2020-2040.
- 6.19 Through the Local Plan Review it is considered essential to review all sources of housing supply, including existing commitments. Whilst it is recognised that the Plan for Stafford Borough was only completed in 2017, further information or evidence may have arisen since adoption that raises questions of suitability or delivery of sites allocated.
- 6.20 All potential sources of supply should be scrutinised through the Local Plan Examination in Public, especially non-allocated windfall sites, and it is recommended that a site-specific housing trajectory is prepared to support the Preferred Options consultation. This should provide delivery assumptions in respect of any proposed preferred option allocation i.e. build out rates and lead in times.
- 6.21 If sites currently relied upon for delivery prior to 2031 no longer represent a deliverable or developable proposition or there are more appropriate alternatives in line with a new spatial development strategy, they should be removed from the supply and the emerging Local Plan as appropriate.

- 6.22 Richborough Estates consider that it is highly unlikely that a future supply of 6,000 homes can be demonstrated in Stafford Borough to 2031 through existing planning commitments and uncommitted allocations.

Question 5.D: Do you agree with the basis for the preparation of the 2019 Settlement Hierarchy? Do you agree that the smaller settlements should be included in the Settlement Hierarchy?

- 6.23 Richborough Estates supports the emerging Settlement Hierarchy in that it identifies Stone as a Tier 2 Settlement, second only to Stafford. This reflects Stone's position as the second largest settlements within the Borough and the sustainability credentials of the town.
- 6.24 Richborough Estates has no particular view in respect of including the Tier 6 'Smaller Settlements' however, inclusion within the settlement hierarchy should not in itself result in such settlements being afforded growth requirements through a spatial development strategy. Development growth should be focused to the most sustainable settlements within the Borough, including Stone.

Question 5.E: The northern built up areas of the Borough are not properly recognised in the currently adopted Plan – most notably Blythe Bridge, Clayton and Meir Heath/Rough Close. Should these areas be identified in the Settlement Hierarchy for development?

- 6.25 Whilst Richborough Estates has no particular view on whether built-up areas to the north of the Borough should be included within the settlement hierarchy, inclusion in itself, should not determine whether these areas should form part of the spatial development strategy for delivering growth. Development within this area should have regard to any cross-boundary requirements related to Stoke-on-Trent and Newcastle-under-Lyme in particular and should recognise that non-Green Belt opportunities are suitable for development elsewhere in the Borough, including Stone.

Question 5.F: In respect of these potential scenarios do you consider that all reasonable options have been proposed? If not, what alternatives would you suggest? Are there any of these spatial scenarios that you feel we should avoid? If so, why? Which of these spatial scenarios (or a combination) do you consider is the best option? Please explain your answer.

6.26 Richborough Estates considers that all reasonable potential spatial scenarios have been identified, however it is recognised that some of these options are not mutually exclusive. In addition, it is considered that the Garden Communities scenario and Intensification of Town and District Centres are not appropriate to be pursued in isolation.

6.27 It is important that a range of sites across a wide geographical area would provide greater certainty for delivery. Richborough Estates considers that the spatial distribution of growth should be driven by sustainability and the existing settlement hierarchy where possible to support the enhancement of sustainable communities.

Question 5.G: Do you consider that the consideration and utilisation of a new Garden Community/Major Urban Extension (or combination) would be helpful in determining the approach to satisfying Stafford Borough's future housing and employment land requirements? If you think the Garden Community/Major Urban Extension approach is appropriate which of the identified options is the most appropriate?

6.28 The NPPF recognises that planning for larger scale developments such as new settlements or significant extensions to existing towns may be the best way to achieve future supply, provided it is well designed, located and provided with the necessary infrastructure and facilities.

6.29 The Greater Birmingham HMA Strategic Growth Study sets out a number of social and community infrastructure assumptions for new towns/settlements which may be relevant, as follows:

- *"mixed-tenure home and housing types;*
- *employment land provision sufficient to meet aspiration of self-containment;*
- *include integrated health care practice or practices;*
- *include provision of primary school(s) and secondary school;*
- *include provision of local centres to meet everyday convenience shopping needs and provision of 'town centre' incorporating a range of comparison and convenience stores;*
- *provide facilities for community/cultural activities;*

- *uses zero-carbon and energy-positive technologies;*
- *provide coordinated recreational and sporting facilities (including a swimming pool) that meet the needs of the development;*
- *delivery of comprehensive green infrastructure within the new settlement."*

6.30 Land at Uttoxeter Road, already has excellent local access to local services and facilities, some of which are already present in the settlement and some of which can easily be accessed by public transport. This is addressed in more detail in the site-specific section of these representations, which demonstrates clearly the sustainability both of this location and of this proposed option.

6.31 **Question 5.H: Do you agree that the only NPPF-compliant Growth Options proposed by this document are No. 3 (Disperse development across the new settlement hierarchy) and No. 5 (Disperse development across the new settlement hierarchy and also at the Garden Community/Major Urban Extension) and No. 6 (Concentrate development within existing transport corridors)? If you do not agree, what is your reasoning? Do you consider there to be any alternative NPPF-compliant Growth Options not considered by this document? If so, please explain your answer and define the growth option.**

6.32 Richborough Estates considers that Growth Options 2, 3 and 5 are compliant with the NPPF.

6.33 Option 1 would lead to an unbalanced strategy which limits the ability of smaller settlements to adapt and change, potentially having a negative impact upon their sustainability.

6.34 Option 2 would allow for a range of sites to be identified within the Local Plan across a wide geographical area. This would be further increased through the support of local communities in the preparation of Neighbourhood Development Plans where local, organic growth would be supported.

6.35 Option 3 would disperse development to a range of settlements allowing for a balanced spatial strategy which helps deliver growth across towns and villages to meet both strategic and more localised needs.

- 6.36 Option 4 would again potentially lead to an unbalanced strategy although the principle of garden communities in the correct location as part of the spatial distribution is supported.
- 6.37 Option 5 replicates Option 3 with the additional inclusion of a new Garden Community, the consideration of which complies with NPPF paragraph 72.
- 6.38 Option 6 seeks to maximise the benefit of the existing transport network and other infrastructure, however, Richborough Estates propose that this is likely to lead to undesirable ribbon development.
- 6.39 Richborough Estates consider the most appropriate and balanced approach to distributing growth to be Option 2, 3 or 5.

Question 5.I: Do you think that it is appropriate, in order to take the development pressures off the existing settlements in the Settlement Hierarchy, that at least one Garden Community should be incorporated into the New Local Plan? Please explain your answer.

- 6.40 With regard to the delivery of at least one Garden Community, the principle of this is supported as this complies with paragraph 72 of the NPPF. It is important that the right Garden Community is selected however, to maximise opportunities from existing services, facilities and connections rather than requiring large amounts of new infrastructure. The chapter on site specific detail shows that land at Uttoxeter Road, Stone is ideally placed in this regard.

Question 5.J: What combination of the four factors:

- 1. Growth Options Scenario (A, D, E, F, G)**
- 2. Partial Catch Up**
- 3. Discount/No discount**
- 4. No Garden Community/Major Urban Extension**

Should Stafford Borough Council put forward as its Preferred Option at the next stage of this Plan-Making process? Please explain your answer.

- 6.41 In light of the economic growth aspirations of the Borough and the affordable housing need, Richborough Estates considers Growth Option Scenario F is the most appropriate option.
- 6.42 Richborough Estates supports the approach to partial catch-up in respect of headship rates to ensure past household suppression is not forecast into the future.
- 6.43 Richborough Estates recognises that a committed supply of housing land will play a role in meeting the housing requirement between 2020 and 2040, however it will be necessary for the Council to ensure robust scrutiny of this supply and subject any uncommitted housing allocation to the same assessment as alternative site options through the plan-making process.
- 6.44 Richborough Estates does not consider it is absolutely necessary for the Council to rely on the delivery of a new Garden Community to meet an appropriate housing requirement for the Borough. If a Garden Community is incorporated within the spatial development strategy further flexibility should be provided within the planned supply to take account of the increased risks of delivery. Delivery assumptions should be realistic.

Question 5.L: Do you agree that the assumptions made in the EDHNA about the need to replace future losses of employment land are reasonable? If not, please explain why.

- 6.45 Richborough Estates agrees with an assumption being incorporated within the EDHNA to take account of future losses of employment land.

Question 5.M: Should the New Plan broadly mirror the spatial distribution of new employment prescribed by the current Plan? If not, what would you suggest and on what basis?

- 6.46 Richborough Estates consider housing growth and jobs growth are intrinsically linked. To ensure balanced and sustainable communities, housing growth should be focused to locations where job opportunities are present, having regard to not only planned employment allocation, but existing employment generating uses. Stone has easy access to such opportunities both locally and via sustainable transport links.

Question 5.0: Are there any sites over and above those considered by the SHELAA that should be considered for development? If so please provide details via a "Call for Sites" form.

- 6.47 Richborough Estates has submitted information in respect of land at Uttoxeter Road, Stone through the "Call for Sites" process.

7. DELIVERING HOUSING

- 7.1 Section 8 of the consultation document considers housing delivery, recognising that the provision of a housing market which reflects the needs of all members of the community is a key objective of plan making.
- 7.2 Richborough Estates seeks to raise a number of views in respect of housing delivery which are intended to be helpful in guiding policy.

Question 8.A: Should the Council continue to encourage the development of brownfield land over greenfield land?

- 7.3 Whilst the NPPF at paragraph 117 requires strategic policies to "*set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land*" it falls short of requiring a brownfield first policy. The plan-making process must recognise the importance of identifying greenfield sites to ensure an appropriate housing requirement can be met within the Plan period and to ensure the Local Plan is deliverable. This is highlighted by the Council's Brownfield Register which identifies brownfield sites that could yield approximately 800 dwellings, noting that these are all consented.

Question 8.B: Do you consider that the enforcement of minimum density thresholds would have a beneficial impact on development within the Borough? If so do you consider the implementation of a blanket density; or a range of density thresholds reflective of the character of the local areas to be preferable? Why do you think this?

- 7.4 Richborough Estates supports the efficient use of land, in accordance with National Planning Policy and Guidance, however, the introduction of a Borough-wide minimum density standard is not supported. Instead, it is necessary for sites to be considered on a site-by-site basis, having regard to local character, context and other planning policy requirements or environmental designations or constraints.
- 7.5 As Stafford Borough is very diverse in terms of housing density across the Borough it is therefore considered that if density standards are incorporated within the Local Plan Review, then these should be minimum standards determined by reference to the character of the local area and the housing mix as determined by local needs. In accordance with national guidance the Council may wish to consider a variety of density standards for different locations.

Question 8.C: Do you think that any adopted minimum density thresholds should reflect the availability of sustainable travel in the area?

- 7.6 Richborough Estates recognise that it may be appropriate to adopt a higher minimum density within town centre locations, where the opportunities to access sustainable travel options is most prevalent.

Question 8.D: Do you consider that the adoption of the Nationally Described Space Standards would work to increase housing standards and therefore enhance the health and wellbeing of local residents in Stafford Borough?

- 7.7 Richborough Estates supports the provision of a range of dwelling types to assist in the provision of attractive and sustainable developments and to assist in contributing towards a balanced housing market.

Question 8.E: In the New Local Plan should the Council:

- a) Apply the Nationally Described Space Standards to all new dwellings, including the conversion of existing buildings?**
- b) Only apply the Nationally Described Space Standards to new build dwellings?**
- c) Not apply the Nationally Described Space Standards to any development?**

- 7.8 Richborough Estates maintains a position that the acceptability of dwelling design and provision of external spaces should be considered on a site-by-site basis.

- 7.9 The NDSS was published by the Department of Communities and Local Government on 27 March 2015. Its publication was accompanied by a Planning Update issued as a Written Ministerial Statement to Parliament by the Rt. Hon. Sir Eric Pickles MP on 25th March 2015.

- 7.10 In introducing the standards, the Written Ministerial Statement outlines:

'New homes need to be high quality, accessible and sustainable. To achieve this, the government has created a new approach for the setting of technical standards for new housing. This rationalises the many differing existing standards into a

simpler, streamlined system which will reduce burdens and help bring forward much needed new homes.'

- 7.11 However, the Written Ministerial Statement is also clear that the standards are optional, and that compliance cannot be required outside of a relevant current Local Plan policy:

'From 1 October 2015: Existing Local Plan, neighbourhood plan, and supplementary planning document policies relating to water efficiency, access and internal space should be interpreted by reference to the nearest equivalent new national technical standard. Decision takers should only require compliance with the new national technical standards where there is a relevant current Local Plan policy.'

- 7.12 This is to ensure that the need for the application of the standards through planning policy is fully evidenced and that the impact on viability is considered alongside all of the other policies contained in the Plan:

'The optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the National Planning Policy Framework and Planning Guidance.'

- 7.13 The reference to the National Planning Policy Framework relates to paragraph 174 which states:

'Local planning authorities should set out their policy on local standards in the Local Plan, including requirements for affordable housing. They should assess the likely cumulative impacts on development in their area of all existing and proposed local standards, supplementary planning documents and policies that support the development plan, when added to nationally required standards. In order to be appropriate, the cumulative impact of these standards and policies should not put implementation of the plan at serious risk, and should facilitate development throughout the economic cycle. Evidence supporting the assessment should be proportionate, using only appropriate available evidence.'

- 7.14 The reference to the National Planning Guidance relates to the following:

'Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:

- *need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.*
- *viability – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.*
- *timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.’*

7.15 The Guidance is therefore clear that the application of the NDSS requires a Local Plan policy which has been fully evidenced, including identification of need and the consideration of any impact on viability. If the Council were to consider introducing such a requirement, further evidence is necessary.

7.16 Regarding need, no justification or evidence is provided and until it is the NDSS should not be applied to any site on the premise it would be unsound. Richborough Estates consider there is unlikely to be any local circumstances within Stafford Borough that would support such an imposition of the Nationally Described Space Standards (NDSS).

7.17 Regarding viability, there is an intrinsic link between the affordability of a property and its size (in floorspace) typically expressed as a cost (£) per square metre (or square foot). Should the NDSS be implemented within Stafford Borough, the building costs would increase, and these additional costs would be offset by the increase in market value, estimated to be in the order of 10%.

7.18 Therefore, artificially increasing the floor area of properties to achieve NDSS standards would serve the purpose of ‘pricing out’ a number of potential purchasers that have a current housing need. This is despite local evidence justifying a significant affordability issue being present within the Borough.

7.19 The imposition of NDSS should not be required on any site unless it is further justified on grounds of viability.

Question 8.F: Do you consider that the housing mix detailed in the table above will be sufficient in meeting the needs of all members of the community?

- 7.20 Richborough Estates considers that it is most appropriate for housing mix to be guided by market signals, as defined within the most up-to-date assessment of needs. The assessment of needs should be routinely updated across the 20-year Plan Period. This ensures that housing mix is reflective of market-driven need.
- 7.21 Richborough Estates does however recognise the recommended range provides a good level of flexibility to allow for changing market signals across the Plan period and in different locations within the Borough. It is therefore considered sufficient in terms of ensuring the needs of all members of the community can be met.

Question 8.G: Do you consider the lack of smaller housing units to be an issue within the Borough of Stafford? If so, are there any areas where this is a particular problem?

- 7.22 Richborough Estates considers the existing housing stock within Stone to be balanced however recognises the current demand for smaller 2 and 3 bed properties across the Borough.

Question 8.H: Should the Council consider a policy requiring 10% of affordable homes delivered on new major development sites to be wheelchair accessible?

- 7.23 If the Council wishes to adopt the higher optional standards for Part M Category 2 and 3 then this should only be done in accordance with the NPPF (para 127f & Footnote 46). The Written Ministerial Statement (WMS) dated 25th March 2015 stated that "*the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG.*" Richborough Estates considers that this suggested policy requirement has not been justified by the evidence base available at present.

Question 8.I: Should the Council consider a policy requiring bungalows to be delivered on all major developments? If so, should there be a minimum number or proportion of such bungalows for each development? Should the amount of land required for such bungalows be reduced by either limiting their garden size or encouraging communal/shared gardens? Is

**there a need for bungalows to be delivered in both urban and rural areas?
Are there any other measures the Council should employ to meet the
demand for specialist housing within the Borough of Stafford?**

- 7.24 It is considered that the need to deliver specialist housing, including bungalows, should be guided by demand and market signals, through an up-to-date evidence base. It would be inappropriate to impose a Borough-wide percentage provision for bungalows, the demand for which varies geographically.
- 7.25 If bungalows are to be provided within a scheme, it would seem logical to reduce garden sizes or allow for the provision of communal/shared gardens to ensure efficient use of land and to reflect any desire from the market for low-maintenance external amenity areas. This approach is also likely to align to any appropriate space about dwellings requirements which should reduce the necessary distance between principal facing windows for ground floor windows, where intervening boundary treatments would interrupt views.

**Question 8.J: Do you consider that there is no need for additional provision
of student accommodation within the Borough?**

- 7.26 Richborough Estates has no view on whether additional provision for student accommodation is required, however, any provision should not contribute towards the annual housing requirement.

**Question 8.K: Do you consider an affordable housing provision of between
252 and 389 units per annum to be achievable? In the instance whereby a
lower provision of affordable housing is sought, would the supplementary
supply of a diverse range of market housing in accordance with the
findings of the EDHNA be sufficient?**

- 7.27 The level of affordable housing provision that is achievable will be intrinsically linked to the annual housing requirement established through the Local Plan review and overall plan viability having regard to all other policy requirements sought.
- 7.28 Utilising the highest annual requirement of 746 dwellings per annum set out in Scenario F, the affordable housing requirement would represent between 34% and 52% of all homes delivered. Based upon the annual housing requirements set out through the EDHNA, Richborough Estates consider that an affordable housing provision of 389 per annum is unachievable. It is also relevant that the highest level of annual affordable homes delivered within the Borough through the current

Plan period equated to 343 dwellings in 2016/17 based on a total of 1,010 dwellings (34% of all completions).

- 7.29 Richborough Estates is of the opinion that a target of 252 affordable homes per annum is only like to be achievable if a housing requirement in line with Scenario F, as a minimum, is pursued. This would require a continuation of an affordable housing requirement of between 30% and 40% on qualifying sites and this would need to be balanced with other policy requests through an assessment of viability.

Question 8.M: In order to help maintain the potential supply of land for rural affordable housing should the Council, where development has not yet commenced, convert existing Rural Exception Site Planning Permissions to Rural Affordable Housing Site Allocations?

- 7.30 The NPPF defines Rural Exception Sites as "*small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection.*" As these sites represent sites that would not normally be used for housing, in the large part due to the sustainability of locations, and represent sites that should not be relied upon in meeting the overall housing requirement, Richborough Estates consider an approach to convert these permissions to site allocations through the Local Plan to be unsound. The suitability and deliverability of these unimplemented permissions should be subject to the same level of scrutiny and assessment as all other reasonable sites contained within the SHELAA, having regard to the spatial development strategy.

Question 8.N: Should the Council introduce a policy requiring all new developments with a site capacity of over 100 dwellings to provide 5% of those plots as serviced plots available for self and custom build homes? Should the Council allocate plots for the purpose of self-build throughout the Borough?

- 7.31 In terms of the requirement for all major housing development proposals to provide evidence that they have fully considered the provision of self/custom build within the overall housing mix on site, from an urban design/ masterplanning perspective, the integration of a number of self builds into a scheme being delivered by a volume housebuilder (that often work on standard house types) would possibly be difficult to achieve in respect of both making an efficient use of land; and to achieve design

consistency. Further, sites currently being put forward by developers have been negotiated on the basis of existing planning policies and values and such an addition could impact on viability. It is recommended that further work be commissioned in order to find out where households would like to have the opportunity to undertake a self and custom build, so that the planning policies can better provide for the need rather than simply asking developers of all large sites to offer land.

- 7.32 In addition, the Council's own evidence base does not appear to fully justify a need for self/custom build properties to be considered on all sites over 100 dwellings. In October 2019 only 45 people had registered. This evidence does not support the Council's suggested approach.
- 7.33 A key priority of the Government is to boost the supply of housing by a variety of means to meet the varied housing needs of people across the UK. Self-build and custom housebuilding have been identified as a significant element of the Government's agenda to increase housing supply. The NPPF gives explicit support to policies which would plan for a mix of housing based on the needs of different groups in the community, including people wishing to commission or build their own homes. In addition, paragraph 61 of the NPPF sets out that Local Planning Authorities (LPAs) have a duty to assess the local demand for self-build plots and must also make provision for that demand.
- 7.34 With regard to facilitating the provision of self-build and custom build housing within Stafford Borough, the identification of specific sites for such development is favoured, as this option would have a greater chance of ensuring that the needs of local people wishing to build their own homes are met. It is recommended that these sites are specifically allocated as self-build/custom build housing sites within the Local Plan Review document.

8. DELIVERING QUALITY DEVELOPMENT

- 8.1 Section 9 of the consultation document relates to the quality of development. Richborough Estates seeks to provide views in respect of blue and green infrastructure, landscape and general design guidance.

Question 9.A: Should the Council have a separate policy that addresses Green and Blue Infrastructure? Identify specific opportunities for development opportunities to provide additional green infrastructure to help provide the “missing links” in the network?

- 8.2 The importance of green and blue infrastructure is, unquestionably, important in delivering good design and ensuring that it reaches beyond the site linking to areas beyond. However, caution should be exercised in being too prescriptive as sites and their contexts will vary. Notwithstanding this, it is important that opportunities for linkages are maximised and clearly articulated, through an evidence-based approach which is then clearly shown on a policies map to provide certainty.

Question 9.B: How should plan policies be developed to seek to identify opportunities for the restoration or creation of new habitat areas in association with planned development, as part of the wider nature recovery team?

- 8.3 Policies must be prepared in conformity with the NPPF, paragraph 174 which states that plans should:
- A. identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation and;
 - B. promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

Question 9.C: Should the new Local Plan continue to protect all designated sites from development, including maintaining a buffer zone where appropriate? Encourage the biodiversity enhancement of sites through

development, for example, allocating sites which can deliver biodiversity enhancements? Require, through policy, increased long-term monitoring of biodiversity mitigation and enhancement measures on development sites?

- 8.4 Paragraph 175 of the NPPF sets out the approach for considering planning applications in the context of habitats and biodiversity so the Local Plan must conform to this. It should be borne in mind that well designed developments can enhance biodiversity so the policy should contain wording which allows this to happen.

Question 9.D: How should plan policies have regard to the new AONB Management Plan and Design Guidance?

- 8.5 Where relevant, the Local Plan should contain a clear hook to the AONB Management Plan. However, the Management Plan has a different legal status, therefore any policies which are to be drawn through which would be used in the setting of Local Plan policy or used as a material consideration in the determination of planning applications should be made very clear so that they can be consulted upon through the Local Plan process.

Question 9.E: Do you consider that the described approach will achieve the Council's ambition of maintaining and increasing tree cover within the Borough? Are there any further measures which you think should be adopted to further enhance these efforts?

- 8.6 This approach is supported.

Question 9.F: Should the Council consider a policy requirement that new development take an active role in securing new food growing spaces? If yes, are the following measures appropriate?

- a) **Protecting and enhancing allotments, community gardens and woodland;**
- b) **Supporting food growing, tree planting and forestry, including the temporary utilisation of cleared sites;**
- c) **Requiring major residential developments to incorporate edible planting and growing spaces;**
- d) **Ensuring landscaping is flexible so that spaces may be adapted for growing opportunities.**

- 8.7 This approach is supported in principle but should not be used to preclude or block development, but to help inform good design which incorporates applicable elements as set out above. Furthermore, monitoring will be essential as evidence of demand will be needed to inform local specifics for example whether there is need for allotments (local waiting lists or underused plots for instance).

Question 9.G: Should the new Local Plan set out specific policies to require new development to minimise and mitigate the visual impact that it has on the Character Areas and quality of its landscape setting?

- 8.8 Provided that the context is clearly justified it would be sensible and appropriate to include positively worded policies which would require an LVIA to accompany and inform development proposals; unless they were part of an allocated site and then potentially only a LVA would be required as those sites will have already been tested through the Local Plan Examination in Public.

Question 9.H: Do you consider there are areas in the Borough that should have the designation of Special Landscape Area? If so, explain where.

- 8.9 Case law has considered the issue of landscape value and what it means for a landscape to be valued. *Stroud DC vs. SSCLG [2015] EWHC 488 (Admin)* is clear that, whilst valued landscapes do not need to have a formal designation, 'valued' means something more than just 'popular'. Landscape is only 'valued' if it has physical attributes which take it out of the ordinary.
- 8.10 The Landscape Institutes' Guidelines for Landscape and Visual Impact Assessment ('the GLVIA') identifies various factors that may be relevant in the assessment of landscape value, including:
- Condition/Quality,
 - Scenic Quality,
 - Rarity and Representativeness,
 - Conservation Interests,
 - Recreation Value,
 - Perceptual Aspects; and

- Cultural Associations.

8.11 Richborough Estates considers that further evidence is required if further designations are sought to determine landscape is 'special' or 'valued'. This should be evidenced having regard to the above criteria.

Question 9.J: Do you consider that the current "Design" SPD provides sufficient guidance for design issues in the Borough? Please explain your rationale.

8.12 The Design SPD is considered to provide sufficient guidance however, Richborough Estates considers this should be updated to reflect the National Design Guide, published in October 2019.

Question 9.L: To support a new Local Design Review Panel should the new Local Plan:

- a) Require complex or Large-Scale development to be subject to review by a Regional Expert Design Panel, to form a material consideration in the planning decision?**
- b) To adopt (and commit to delivering), nationally prescribed design standards e.g. Manual for Streets, Building for Life, BRE Homes Quality Mark etc**
- c) Reconsider and update local design policies to more robustly reflect current national best practice, be based upon local Characterisation studies, and be specifically aligned with related and companion policy areas to support the wider spatial vision for the Borough.**

8.13 Richborough Estates considers if particular standards are already required at the national level there is no need to reiterate them locally as it is better to refer to them via a general policy hook, which would then be more flexible if the national context changes.

8.14 In relation to design and sustainability standards, it is acknowledged that the Code for Sustainable Homes has been withdrawn by the UK Government. However, it is noted that the BREEAM sustainability assessment can still be used, for new residential, as well as other buildings. In light of the fact that there is no mandatory requirement for many of the identified standards it is considered that this should be left to the discretion of the developer, rather than included within local planning policy. Indeed, as Paragraph 150 b) of the NPPF states, any local requirements for

the sustainability of buildings should reflect the Government's policy for national technical standards.

- 8.15 In respect of a design review panel, it is not considered their opinion can be used as a material consideration in the determination of a planning application. It is not unusual for design policies to be interpreted in different ways but still arriving at an effective design solution which is policy compliant. Even if a design review panel disagree with a development proposal, that does not mean it is an inappropriate from of development if it satisfies the design policies.

Question 9.M: Do you consider the designation of sites as Local Green Space to be necessary through the new Local Plan?

- 8.16 Richborough Estates considers that it is not necessary to designate Local Green Spaces through the new Local Plan. As these spaces are "*green areas of particular importance to local communities*" (ID: 37-005) it may be more appropriate to allow identification through the Neighbourhood Planning process.
- 8.17 In determining Local Green Spaces, regard must be had to the spatial development strategy to ensure they would not undermine the Local Plan's aim to "*identify sufficient land in suitable locations to meet identified development needs*" (ID: 37-007).

Question 9.N: Do you believe that there are areas within Stafford Borough that are poorly served by public open space. If so where? Are there any other Borough-wide facilities you feel should be associated with open space? Are there any settlements that you believe are lacking in any open space provision? Should the Council seek to apply Play England standards to new housing developments? Should the Council seek to apply Fields in Trust standard to providing sports and children's facilities? Should the Council seek to apply Natural England's ANGSt to new development? Should the Council seek to develop a bespoke standard in relation to open and/or play space? Do you consider that developments over 100 houses should incorporate features that encourage an active lifestyle for local residents and visitors? Do you consider that developments over 100 houses should provide direct connections from the development to the wider cycling and walking infrastructure? Should the Council require all high density schemes to provide communal garden space?

8.18 Richborough Estates considers that policy must be capable of being flexible to support the local context. Thresholds seem rather arbitrary and therefore Richborough Estates suggest it would be more appropriate to ensure that developments are prepared in line with a design framework; one which references good practice and guidance which may well be subject to change throughout the Plan period.

Question 9.0: Should the Council seek to designate land within the new Local Plan 2020-2040 to address Borough-wide shortage of new sporting facilities? Identify within the new Local Plan the site in which a new swimming pool should be developed?

8.19 Richborough Estates consider all policies and proposals will need to demonstrate deliverability, and any future requirements will need to be justified in order to provide certainty in terms of compliance with Regulation 122 of the CIL Regulations and the need for developer contributions should these be required. Further evidence will be required in respect of new sporting facilities as the plan progresses and this should be informed by any corporate strategy prepared by the Borough Council.

9. ENVIRONMENTAL QUALITY

9.1 Chapter 10 focuses upon environmental quality including air quality, noise and light pollution, and the management of waste.

Question 10.A: The currently adopted Plan for Stafford Borough does not include any policies aiming to increase air quality levels. The new Local Plan provides an opportunity to amend this. Therefore, should the Council:

- a) **Ensure the installation of infrastructure to support the transition from petrol and diesel to electric powered vehicles on every major development?**
- b) **Ensure all major development is accessible by regular public transport?**
- c) **Enforce Air Quality Management Zones around areas of notable biodiversity importance?**
- d) **Employ any further methods which you consider will aid in the improvement of air quality within the Borough?**

9.2 In terms of ensuring the installation of infrastructure to support the transition from petrol and diesel to electric powered vehicles, it is considered that more evidence is required. Whilst the principle is supported by Richborough Estates, and local plan policies can provide the context for supporting such change, this will also depend on further detail: for example is the infrastructure appropriate; can the grid support capacity in the area being developed; and, what is the impact upon viability and deliverability?

9.3 In terms of Air Quality Management Zones, again it is considered that further evidence is required. This evidence should consider the potential impact upon sites of biodiversity (given that these will vary) and whether such zones would achieve proposed outcomes.

Question 10.B: The currently adopted Plan for Stafford Borough does not enforce any policy to mitigate for the impact of NO₂ particles on internationally designated sites. Therefore should the Council enforce a scheme whereby any development likely to result in an increase of NO₂ deposition on these sites in Stafford Borough must contribute to a mitigation programme?

9.4 Again, Richborough Estates consider further evidence is required to show what the impact is likely to be and whether this impact arises as a consequence of proposed development (in order to justify the need for mitigation). Any mitigation strategy would also need to consider the effect upon Plan viability.

Question 10.C: The currently adopted Plan for Stafford Borough makes reference to waste management in Policy N2. However, the growing population of Stafford Borough and the need for further action to combat climate change suggests the employment of further, more stringent measures encouraging sustainable waste disposal is desirable. Therefore, should the Council:

- a) Consider a policy requiring all major developments to detail how they will provide infrastructure facilitating recycling and composting on site?**
- b) Require developers to submit a strategy for how they will dispose of waste in a sustainable manner throughout the construction phase of development?**
- c) Employ any further measures to increase the sustainable and efficient disposal of waste in Stafford Borough?**

9.5 Richborough Estates considers that much more detail is required, particularly as this potentially overlaps with the role of the County Council and the Waste Local Plan, which itself is also part of the Development Plan. The current Waste Local Plan, covering the period 2010 - 2026 was adopted in 2013 and was reviewed in 2018. It is due for a further review in 2023, 'unless an earlier review is deemed necessary due to significant changes in national policy and guidance, local circumstances or our strategic priorities'. The new Local Plan for Stafford Borough needs to ensure it is in conformity with the Waste Local Plan otherwise considerable confusion and uncertainty will arise.

10. LAND AT UTTOXETER ROAD, STONE

Site Proposals

- 10.1 Richborough Estates is promoting Land at Uttoxeter Road, Stone for residential development. It is anticipated that the site can accommodate approximately 85 dwellings. A Site Location Plan and Indicative Masterplan are included at **Appendix 1** and **Appendix 2** to this representation accordingly.

The Site

- 10.2 The Site comprises approximately 4.56ha of land adjoining the south-eastern edge of Stone, Staffordshire, which is currently used for agricultural purposes.
- 10.3 The site is bounded to the north by existing residential development and Uttoxeter Road (B5027); to the east by a track which provides access to Little Stoke Farm, and beyond by the Little Stoke Cricket Club and undeveloped agricultural land; to the south by undeveloped agricultural land; and to the west by the West Coast Mainline and beyond by existing residential development.
- 10.4 The site is located entirely within Flood Zone 1 (land having less than 1 in 1,000 annual probability of river or sea flooding). The site is not subject to any nationally significant landscape, heritage, ecological or other designations (such as National Park, Scheduled Ancient Monuments, SSSI's or World Heritage Site). Furthermore, the site does not have any local environmental or other designations and it is not located in an area of Green Belt.
- 10.5 The site comprises a mix of Grade 5 and Grade 3b agricultural land and is therefore does not comprise best and most versatile agricultural land.
- 10.6 The site has previously been the subject of two planning applications for residential development (ref: 14/21316/OUT and ref: 16/24533/OUT). However, these applications were both refused due the site being located beyond the settlement boundary in an instance when the Council was able to demonstrate a five-year supply of housing sites. The most recent application satisfied Network Rail's previous concerns in respect of addressing the function and safety of the level crossing to the southwest, whilst avoiding detriment to the function of the highway.

The Surrounding Area

- 10.7 The surrounding area is predominantly residential in character, with the built-up area comprised of housing, services and employment areas. The Site is not located in close proximity to any Conservation Areas or areas of landscape or other sensitivity. A listed building is located approximately 200m to the west of the site access, immediately adjacent to the level crossing on Uttoxeter Road, but it is not visible from the site.
- 10.8 The Site is in close proximity to a range of shops, services and employment areas. In particular, the site is approximately 2km from Stone town centre, which provides a range of shops and services, including food stores, post offices and other day-to-day facilities. The site is also located approximately 1.6km from Stone Business Park which includes a range of industrial and commercial businesses.

Sustainable Travel

- 10.9 There are a range of local facilities near to the site. These include, but are not limited to (distances are approximate from centre of the site):
- Little Stoke Cricket Club and Bowling Green - 100m
 - Smartys pre-school nursery - 300m
 - Three Crowns Public House - 350m
 - Fairway Service Station (convenience store/newsagent, car garage and petrol station) - 350m
 - St. Michael's Church of England First School - 1,000m
 - Aston Marina Farm Shop and Bistro - 1,100m
 - Stone Cricket Club - 1,400m
 - Mansion House Health Surgery - 1,850m
- 10.10 The site benefits from genuine opportunities to utilise sustainable transport modes such as bus and train services, which are available within the centre of Stone. In particular, Stone Railway Station benefits from hourly services between Crewe and London Euston, via Stafford.

Access

10.11 Initial highways consideration confirms that a safe and suitable access can be provided to the site via T-junction from Uttoxeter Road. The identified site access is able to achieve 2.4 x 59m visibility splays in either direction, in accordance with Manual for Streets.

Landscape

10.12 Richborough Estates has instructed both desktop and fieldwork analysis in respect of the site, which has determined that the site, and its immediate context, contains features representative of the 'Settled Farmlands' LCT; however, it does not contain any particularly notable, rare or unique features. This is important to understand when considering the potential impacts of the proposed development in the context. The submitted indicative masterplan included at **Appendix 2** to this Representation has also utilised the key characteristics of the LCT to inform the design and site proposals have addressed important landscape objectives and recommendations highlighted in the relevant SPG.

10.13 Available views towards the site and the existing visual experience are greatly influenced by the wider undulating topography, on site vegetation, surrounding woodland belts and the established settlement of Stone, situated to the north and west of the site. Clearer views are mainly confined to the site's immediate surroundings and middle ground to the east; although, the site is only ever seen in part from these locations. Distant views are mostly filtered by prominent intervening vegetation or partially restricted by existing built form.

10.14 Overall, it has been assessed that character effects are localised and that visual effects are largely limited to the site and its immediate surroundings. The majority of the relevant landscape policy objectives and SPD/SPG criteria are satisfied through an appropriate development response that responds to the site-specific criteria and established landscape strategy.

Flood Risk and Drainage

10.15 Based on the Environment Agency's Flood Map for planning, the site is shown to be located within Flood Zone 1; land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%), and therefore is suitable for residential development.

10.16 The site is capable of being development in such a way so as to not increase the risk of flooding associated with surface water run-off. Any development would incorporate SuDS in accordance with Local Plan Policy N2 and include an additional 30% allowance to accommodate the effects of climate change.

Indicative Proposal

10.17 To accompany these representations, an indicative masterplan has been prepared, including at **Appendix 2**. This has been prepared having regard to existing constraints, as well as relevant planning policy and guidance.

10.18 The indicative masterplan identifies the following key features:

- Delivery of approximately 85 dwellings, provided at a gross density of 18.6 dwellings per hectare (31 dwellings per hectare net);
- Access from Uttoxeter Road;
- 0.52 Ha of formal public open space, with an additional 1.28 Ha of general green space or green infrastructure, including retaining existing vegetation wherever possible; and
- Attenuation ponds to western edge of site.

10.19 The general layout of the indicative masterplan can be divided into three approximately areas: the residential parcel directly off the access from Uttoxeter Road, and two separate parcels of residential development separated from the first by a linear green corridor. These in turn are separated from each other by an existing watercourse and hedge. This layout ensures the most efficient use of the site area, retaining natural features of value, without compromising the visual amenity of the wider area when viewed from the surrounding countryside.

10.20 The layout and block structure have been designed not only to complete the south-eastern settlement edge of Stone, but to also create a positive relationship with the open countryside beyond. Blocks have been orientated to create a soft edge to the development. Creating a positive interface between the proposed development and the surrounding countryside.

10.21 The layout of the development has been based around a perimeter block structure. Residential blocks and frontages respond to adjacent street hierarchies to provide a permeable and legible form of development. All block dimensions have been

designed to allow for flexibility with regard to housing types and parking arrangements whilst adhering to good design principles. Parking is provided through a range of different arrangements, either on plot, or in garages or on street. These vary according to street character.

10.22 Areas of formal and informal public open space run throughout the proposals. The linear green corridor running diagonally across the site provides an opportunity for informal open space. This will allow for considerable levels of habitat and buffer planting to help support local wildlife and reduce the visual impact of the proposed development. Areas of formal public open space are scattered across the development, designed to be accessible to all. These are located centrally, and to the east and south of the residential areas.

10.23 There is a large open space buffer to the western edge of the site, designed to protect the new residential community from any adverse noise of the railway line. This area of open space also provides an opportunity for sustainable drainage systems to be located at the lowest part of the site, to naturally drain the proposed development.

Suitability

10.24 The indicative masterplan demonstrates how a scheme for approximately 85 dwellings can be achieved having regard to development design guidelines and development standards currently utilised by the Council. The proposal is sustainable and represents a logical extension to the settlement of Stone.

Deliverability

10.25 Detailed technical work prepared in support of the previous planning applications on this site have demonstrated that there are no technical constraints to prevent its deliverability.

10.26 Further technical work can be commissioned to further demonstrate the deliverability of this site. However, initial technical work in relation to the key disciplines undertaken to date confirms there are no constraints likely to render the site undeliverable in the Plan period. The site is available now.

10.27 There are no existing uses that would require relocation and no issues of contamination that would require remediation.

10.28 The site is deliverable and immediately available and, subject to allocation, could deliver homes and associated community benefits within the next 5 years.

11. CONCLUSION

- 11.1 Richborough Estates supports Stafford Borough Council's decision to commence a review of the Local Plan. This provides an opportunity for the Council to comprehensively review the vision, strategic objectives, development requirements, spatial development strategy and policies for shaping detailed development proposals.
- 11.2 In respect of the vision and objectives, Richborough Estates considers that the review should seek to distil elements of the current vision and objectives that remain relevant to the Borough, into a concise overview of change sought to 2040.
- 11.3 In respect of emerging policy choices, it is recognised by Richborough Estates that further evidence will be required to support policy requirements and that elements of this further evidence will form an iterative part of the plan-making process to respond to the emerging growth requirements and spatial development strategy.
- 11.4 In respect of housing growth Richborough Estates considers Growth Option Scenario F is the most appropriate option. This scenario aligns to the economic growth aspirations of the Borough and the affordable housing need set out in the EDHNA. As part of this requirement Richborough Estates supports the approach to a partial catch-up in respect of headship rates to ensure past household suppression is not forecast into the future.
- 11.5 Richborough Estates recognises that an existing committed supply of housing land will play a role in meeting the housing requirement between 2020 and 2040, however it will be necessary for the Council to ensure robust scrutiny of this supply and subject any uncommitted housing allocation to the same assessment as alternative site options through the plan-making process.
- 11.6 With regard to the delivery of at least one Garden Community, the principle of this is supported by Richborough Estates as this complies with paragraph 72 of the NPPF. It is important that the right Garden Community is selected however, to maximise opportunities from existing services, facilities and connections rather than requiring large amounts of new infrastructure. If a Garden Community is incorporated within the spatial development strategy further flexibility should be provided within the planned supply to take account of the increased risks of delivery. As such Richborough Estates supports the pursuit of Growth Options 2, 3 or 5 as representing the most appropriate distribution of housing growth to 2040, with an amendment to allow communities to bring forward additional growth where

this would be supported locally through a Neighbourhood Development Plan. This approach would ensure all communities have the ability to meet housing needs in line with national guidance.

- 11.7 Land at Uttoxeter Road is promoted by Richborough Estates as a suitable and sustainable location for residential development, representing a deliverable proposition, being available now and providing every prospect that approximately 85 homes can be delivered within the plan period. The site is aligned to the various spatial development strategy options being considered by the Borough Council and would assist in delivering an appropriate housing requirement and supporting the economic aspirations of the Borough.

APPENDIX 1

SITE LOCATION PLAN



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Application Site Boundary

Client:
Richborough Estates

Project:
Land at Uttoxeter Road, Stone

Drawing:
Site Location Plan

Scale: **1:1,250 (A3)** Status: **Planning**

Project Number:
RICM2001

Drawing Number:
1000

Date: **27/10/14** Revision: **03**



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APPENDIX 2

INDICATIVE MASTERPLAN



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- Site boundary
- 1 Proposed Vehicular Access
- 2 Proposed Pedestrian Access
- 3 Primary Street
- 4 Secondary Street
- 5 Shared Lane/Driveway
- 6 Existing Trees
- 7 Enhance Boundary Planting and 1.75m Livestock Fence
- 8 New/Enhanced Habitat Planting
- 9 Public open space
- 10 Attenuation Pond
- 11 Diverted watercourse

Client:
Richborough Estates

Project:
Uttoxeter Road, Stone

Drawing:
Illustrative Masterplan

Scale:
1:1,250 (A3)

Status:
Draft

Project Number:
RICM2001

Drawing Number:
3000

Date:
27/10/2014

Revision:
05



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**New Stafford Borough Local Plan 2020-2040
 “Issues and Options” Consultation - Response Form**

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent’s Details (if applicable)
Title		
First Name	Matthew	
Surname	Stafford	
E-mail address	████████████████████	
Job title (if applicable)	Senior Planning Manager	
Organisation (if applicable)	St Modwen Properties Plc	
Address	████████████████████ ████████████████████ ████████████████████	
Postcode	██████████	
Telephone Number	██████████	

Thank you for taking the time to provide your comments on the “Issues and Options” document for the Stafford Borough Local Plan 2020-2040. All comments will be considered when preparing the Preferred Options for the New Local Plan.

Please return this form either by email (preferred) to: forwardplanning@staffordbc.gov.uk

or by post to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ

Please ensure receipt by Stafford Borough Council **by 12.00 noon Tuesday 31 March 2020.**

For advice on how to respond to the consultation and how to fill in this form, please see the Consultation Guidance Notes on the Council’s website at: www.staffordbc.gov.uk/new-local-plan or call 07800 619636 / 07800 619650.

Please note:

- Comments must be received by 12noon on Tuesday 31 March 2020. Late comments will be considered “not duly made” under the Regulations;

- Please fill in a separate Part B for each question/paragraph/table/topic you are commenting on and, where necessary, please explain your response;
- Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name		Organisation			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question		Other	
2. Please set out your comments below					
See attached representations submission dated 20 April 2020.					

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question		Other	
2. Please set out your comments below					

Please use a continuation sheet if necessary

All comments should be made in writing preferably using this form and should be received by Stafford Borough Council **no later than 12 noon Tuesday 31 March 2020**.

You can view the documents online at www.staffordbc.gov.uk/new-local-plan-

Please e-mail your comments (Preferred) to: forwardplanning@staffordbc.gov.uk

or post your comments to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ

Thank you for taking the time to contribute to this consultation.

NEW LOCAL PLAN 2020-2040: ISSUES & OPTIONS
STAFFORD BOROUGH COUNCIL – PRIVACY NOTICE

How we will use your details

All representations received to the Stafford Borough New Local Plan 2020-2040 Issues & Options consultation document will be included in a schedule and made publicly available once the consultation has closed.

Stafford Borough Council will consider all representations received, using them to inform the next stage of the process for the New Local Plan 2020-2040.

Comments cannot be treated as confidential. Your personal information, such as your postal and email address will not be published and signatures will be redacted, but your name and organisation will be made available. We will only use your personal information to send you information on the New Local Plan and associated planning policy matters.

We believe you should always know what data we collect from you and how we use it, and that you should have meaningful control over both. As part of our ongoing commitment to transparency, and in relation to the new General Data Protection Regulations (May 2018), we have updated our Privacy Policy.

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Stafford Borough Local Plan 2020 – 2040
Issues and Options Consultation February 2020

Representations 20 April 2020

CONTENTS

1 INTRODUCTION.....1

2 SECTION 1 (INTRODUCTION).....2

3 SECTION 3 (VISION AND OBJECTIVES)4

4 SECTION 5 (THE DEVELOPMENT STRATEGY)5

5 SECTION 7 (TOWN CENTRES AND FUTURE NEEDS) 12

6 SECTION 8 (DELIVERING HOUSING)..... 13

7 CONCLUDING REMARKS 14

APPENDIX 1.....

LICHFIELD ROAD STAFFORD - SITE LOCATION PLAN.....16

APPENDIX 2.....

COCKNAGE ROAD - SITE LOCATION PLAN

APPENDIX 3.....

'CALL FOR SITES' SUBMISSION (JANUARY 2018)

APPENDIX 4.....

STAFFORDSHIRE COUNTY COUNCIL SHELA (2018)

SITE ID: BAR03

APPENDIX 5..... 20

EXTRACT OF DUTY TO CO-OPERATE STATEMENT OF COMMON GROUND (STAFFORDSHIRE MOORLANDS DISTRICT COUNCIL) 20

1 INTRODUCTION

1. St. Modwen enclose representations to the Stafford Borough Local Plan 2020 – 2040 Issues and Options Consultation, which commenced on 3 February and closes on 21 April 2020.
2. St. Modwen is an active landowner and developer across the Midlands, including in Stafford Borough, and has been responsible for securing the delivery and development of a number of mixed use employment/commercial and residential opportunities in recent years in meeting market requirements and supporting the Borough's growth and expansion.
3. St. Modwen has a number of land interests in the area which it is actively promoting, either through the development management or planning policy. The focus of this submission is with regards land interests at:
 - Lichfield Road, Stafford. St Modwen submitted an outline application, which is pending a decision, in February 2020 for the demolition and clearance of existing structures, ground remodelling, drainage infrastructure, and development of up to 365 dwellings with landscaping, access and associated works (20/32041/OUT). A Site Location Plan is enclosed at Appendix 1 and the intention is for the land to be allocated for residential use;
 - Cocknage Road in the north of the Borough between Barlaston and Meir Heath, where the Borough borders neighbouring Stoke on Trent. A Site Location Plan is enclosed at Appendix 2. The site has been the subject of a previous 'Call for Sites' submission (January 2018) at Appendix 3 and it is also of note that adjoining land has also been promoted by Staffordshire County Council (SCC) and considered as part of the Council's Strategic Housing and Employment Land Availability Assessment (SHELAA) (2018) (Site ID: BAR03) (extract enclosed at Appendix 4); The intention is for the land to be allocated for residential use; and
 - Eccleshall to be prioritised in the hierarchy as a sustainable existing location to meet short terms needs for strategic future residential growth.
4. The following sections of this Report respond to the questions pertaining to the following chapters of the Issues and Options consultation document:
 - Section 1 (Introduction);
 - Section 3 (Vision and Strategic Objectives);
 - Section 5 (The Development Strategy);
 - Section 7 (Town Centres and Future Needs); and
 - Section 8 (Delivering Housing).
5. St Modwen trusts that that these comments are duly taken into account in preparing the Council's Preferred Option for the Local Plan and requests that it is kept updated as to any future consultation opportunities.

2 SECTION 1 (INTRODUCTION)

6. St Modwen welcomes Stafford Borough Council's (SBCs) decision to undertake a full Local Plan review, notwithstanding the requirements of the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2017 and the more recently updated guidance contained within the National Planning Policy Framework (NPPF) (2019).

Question 1.A: Is the evidence that is being gathered a suitable and complete list?

7. We note that a range of evidence has already been prepared to inform the Local Plan Issues and Options consultation and welcome the acknowledgement that further evidence will need to be prepared as work on the Local Plan progresses and in responding to consultee feedback at each stage.

Question 1.B: Have any key pieces of evidence necessary for Stafford Borough's new Local Plan been omitted?

Housing Market Area

8. The evidence base produced thus far includes an Economic and Housing Development Needs Assessment (EHDNA) (January 2020) which inter alia, seeks to define the Housing Market Area (HMA) relevant to the Borough for the purpose of plan making.
9. Paragraph 4.32 of the EHDNA concludes that the level of self-containment in Stafford is sufficiently high for the Borough to be considered as a single HMA for the purpose of considering housing needs in the context of the Local Plan. Paragraph 4.33 states that it is '*reasonable and pragmatic to take the administrative boundaries of the Borough as being the 'best fit' HMA for planning purposes*'.
10. However, prior to drawing this conclusion reference is made to the Strategic Housing Market Assessment (SHMA) previously undertaken by Stoke-on-Trent City Council (SoT) and Newcastle-under-Lyme Borough Council (NuL) (2015) in support of their new emerging Joint Local Plan. Whilst this SHMA was prepared pursuant to earlier guidance (namely the Planning Practice Guidance (PPG), 2014) and concluded that SoT and NuL together act as a single HMA, it acknowledged market linkages with areas in the Borough in close proximity to Stoke-on-Trent.
11. Furthermore, we note that as part of the evidence base prepared in support of the emerging Staffordshire Moorlands Local Plan, a Duty to Co-operate Statement (June 2018) was prepared by Staffordshire Moorlands District Council (SMDC). This outlines how SMDC considered that it had met its obligations under the Duty to Cooperate with neighbouring authorities including SoT and Stafford Borough.
12. Appendix 5 to this Statement (in particular, Section 5) details how the authorities were working towards meeting development requirements at that time, accounting for differing HMA requirements and the spatial portrait within the subject area. It is notable that SMDC made a request to Stafford Borough to assist with meeting its housing land requirement shortfall of 190 homes.
13. However, as the Statement outlines, given the need is required to be met in the relevant HMA and in this regard, the land between Stafford Borough and SMDC forms part of the North Staffordshire Green Belt, whilst not explicitly stated, we can only infer that this request was declined as the current adopted Local Plan for Stafford Borough makes no provision for any formal review of the Green Belt. In parallel, the (then) emerging evidence base in support of the Joint Local Plan for SoT

and NuL was unable to demonstrate sufficient available land to meet its own requirements and generally, the plan was at too early a stage to be able to properly assist SMDC.

14. Paragraph 5.9 of the Duty to Co-operate Statement concludes:

"All four authorities will liaise on future consideration and evidence gathering in relation to housing requirements and provision undertaken as part of future plan making".

15. Whilst there is no formal requirement at the Issues and Options stage for an authority to demonstrate how it is cooperating with neighbouring authorities in seeking to address future legal requirements of the plan making process, the Planning Practice Guidance (PPG) (Paragraph 009 of Section 61) encourages cooperation throughout the plan making process.
16. Furthermore, given the historic linkages (in physical and policy terms) between the north Staffordshire local authority areas namely; Stafford, SoT, NuL and SMDC combined with the relatively recent evidence of housing land shortages, the Council should be seeking to establish now the extent to which collaboration and joint working is needed in plan making terms, to ensure future requirements are fully addressed.
17. The absence of any evidence of joint working at this stage is a clear omission in the consideration and analysis of development strategy options, both in the context of meeting development requirements (i.e. for housing and employment generally) and, in establishing whether a review of the boundaries of the North Staffordshire Green Belt is required.
18. For the reasons set out later in this Report, we consider that a review of the North Staffordshire Green Belt is needed as part of the evidence base for the Stafford Local Plan, in order to properly inform the development options presented thus far (and whether any additional options are feasible, including more development in north Stafford) and prior to a Preferred Option being developed.

Garden Community

19. The Issues and Options consultation document promotes a new Garden Community as one of the potential options for accommodating future growth. Whilst accepting that this is only a preliminary consultation stage, insufficient information has been provided to date setting out how or why a new Garden Community could be accommodated, delivered and the extent to which taking such a spatial approach could address future housing and employment land requirements particularly within the new plan period.
20. Much greater evidence particularly in relation to deliverability will be required if the Council is to take this option forward either in isolation of or in combination with other spatial options for the plan.

3 SECTION 3 (VISION AND OBJECTIVES)

Question 3.A: Do you agree that the Vision should change.

21. Yes, the Vision as expressed in the adopted Local Plan is too lengthy and a new Vision is required that reflects what the plans aims and objectives are ultimately seeking to achieve in the new plan period (to 2040).

Question 3.B: Do you agree that the Vision should be shorter?

22. Yes, for the reasons set out above.

Question 3.C: Do you agree that a new Vision, whilst maintaining a commitment to growth, should more explicitly recognise the need to respond to Climate Change and its consequences?

23. The Vision should be based on sustainable growth. Part of this is the recognition that there is a need to respond to climate change and its consequences, and this should be explicitly referenced by the Vision, particularly in terms of the environmental component of sustainable growth. However, it is important to place this alongside the social and economic components of sustainable growth which should be given equal prominence.

Question 3.D: Should the spatially based approach to the Objectives be retained? Does this spatially based approach lead to duplication?

24. Whilst a spatially based approach to the objectives is helpful, in particular, in clarifying what is required in certain locations, in our view, there is scope to produce a condensed schedule of objectives which can make specific locational references, as required (for example, if there is a need to accommodate returning military personnel in Stafford but not elsewhere). This approach would ensure that the objectives were clear and remove duplication or ambiguity where similar objectives have been expressed differently in different locations.

Question 3.E: Is the overall number of objectives about right?

25. The overall scope of the objectives (in terms of topics/issues they cover) is acceptable, but for the reasons set out in response to Question 3.D (above), there are currently too many.

Question 3.F: Should there be additional objectives to cover thematic issues? If so, what should these themes be?

26. We do not consider that any additional thematic objectives are required, over and above those already identified.

4 SECTION 5 (THE DEVELOPMENT STRATEGY)

St. Question 5.A:

a) Do you consider that the existing Policy SP1 addresses the requirements of the NPPF?

27. The existing Policy SP1 broadly addresses the requirements of the NPPF, albeit the most recent (February 2019) text of the NPPF is not fully reflected. The latter refers (part d) to circumstances where 'policies which are most important for determining the application are out-of-date', whereas Policy SP1 refers to 'relevant' policies in this context (our emphasis added). The new Local Plan should reflect the latest NPPF wording.

b) Do you consider that it is necessary to retain this policy in light of the recent change in Planning Inspectorate's view?

28. Whilst duplication with national policy is generally to be avoided an explicit expression of the presumption in favour of sustainable development is useful in setting the tone for the Plan as a whole, so should be retained.

Question 5.B:

a) Which Annual Housing Requirement figure do you think will best meet Stafford Borough's future housing growth requirements?

29. The NPPF expects strategic policy making authorities to follow the standard method in this guidance for assessing local housing need. The Planning Practice Guidance (PPG) (updated 2019) states at Paragraph 003 (Section 2a) that 'there is an expectation that the standard method will be used and that any other method will be used only in exceptional circumstances'.
30. On this basis, Scenario A is an appropriate starting point. Conversely, Scenario's B and C are rightly discounted by the Council (as acknowledged at paragraph 5.9 of the consultation document).
31. Scenario D (Cambridge Econometrics Baseline) indicates a requirement that is lower than the current Local Plan target and on the basis that the NPPF (paragraph 59) seeks to significantly boost the supply of homes, it is our view that the future local plan requirement (per annum) should be no less than what is currently required in the adopted plan (i.e. 500 per annum). For these reasons, we consider that Scenario D should also be discounted.
32. Scenario F is based on the trend in jobs growth between 2000 and 2018. Given that this period included an economic recession (at the mid-point), we do not consider this to be a representative period on which to base future requirements. Furthermore, it fails to acknowledge the Council's economic ambitions and desire to see continued jobs growth in the Functioning Economic Market Area (FEMA).
33. For these reasons, we consider that Scenario's E (Jobs Growth – Policy On) and G (Jobs Growth – Jobs Boost) are more consistent with what we understand to be the Council's wider objectives for the Borough (reflective of the potential benefits that will arise from proposals such as the extension of HS2) and are more aligned with the objectives of the NPPF, including the need to address housing needs and other economic, social and environmental priorities, whilst being aspirational but deliverable.

34. The PPG (paragraph 10) is clear that the Standard Method 'provides a minimum starting point in determining the number of homes needed in an area'. Furthermore, that there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates (i.e. to take account of other factors). Circumstances where this may be appropriate include growth strategies for the area; strategic infrastructure improvements that will drive an increase in the number of homes actually needed locally; or an authority agreeing to take on unmet need from neighbouring authorities.

b) Should a Partial Catch Up rate allowance be incorporated? What is your reasoning for this answer?

35. Paragraph 10.34 of the EHDNA advises that a Partial Catch-up Rate should be applied, in ensuring that the previous suppression of household formation rates for households aged 15 to 34, does not continue to be embedded in the methodology and therefore underestimate or provide for meeting future housing needs in Stafford.

Question 5.C: In calculating the Housing Requirement figure for the new Local Plan 2020 – 2040, should a discount be applied to avoid a double counting of new dwellings between 2020 – 2031? If a discount is applied should it be for the full 6,000 new homes currently accounted for in the adopted Plan for Stafford Borough or a reduced number (please specify reasons)?

36. A discount should only be applied to those dwellings with absolute certainty of delivery following the base date for the calculation, i.e. those under construction at that point. All other extant permissions and allocations should be subjected to the deliverability test embodied in national policy and then retained where appropriate, but not prioritised over other, new, allocations. This will ensure choice and variety in the market, avoid a shortfall of delivery, and support the wider economic growth agenda for the new Plan as a whole.

Question 5.D:

i) Do you agree with the basis for the preparation of the 2019 Settlement Hierarchy?

37. The settlement hierarchy needs to reflect the development strategy options which is considered to omit a review of the boundaries of the North Staffordshire Green Belt. The lack of justification for this approach is increased given the North Staffordshire Urban Areas is proposed as Tier 3 but unable to play any meaningful role in meeting future development needs and will direct growth to less suitable and sustainable locations.
38. The approach taken to reviewing the current adopted Settlement Hierarchy has the potential to better address housing and employment land requirements across the Borough, to enable growth to provide for the improved sustainability of those settlements rather than this being limited primarily to the main areas of Stafford and Stone.
39. The allocation of settlements within the categories needs further evaluation especially in respect of the Tier 4 Large Settlements. The settlements are not considered to have similar characteristics which would see them fall within the same category for example Little Haywood and Colwich has no post office, shop or schools contrary to the other 6 Large Settlements. Furthermore, Eccleshall and Gnosall (except for Distance to Key Employment Location) have an increased function and role well beyond the other 5 Large Settlements. Eccleshall is also recognised in the current plan as a

local centre in the defined retail hierarchy¹ and needs to have greater status in the settlement hierarchy.

40. Without further consideration to Tier 3 via a Green Belt review and Tier 4 of the settlement hierarchy with the elevation of Eccleshall the plan will fail to direct the growth to the most appropriate and sustainable locations.

ii) Do you agree that the smaller settlements should be included in the Settlement Hierarchy?

41. We do not have any objection to the settlement hierarchy identifying small settlements, but this should not and does not infer that they are necessarily suitable or sustainable locations for new development and growth. The merits of future development in these locations needs to be considered in the context of the plan strategy as a whole.

Question 5.E: The northern built up areas of the Borough are not properly recognised in the currently adopted Plan – most notably Blythe Bridge, Clayton and Meir Heath / Rough Close. Should these areas be identified in the Settlement Hierarchy for development?

42. Yes, given the role of the northern built up area as part of Stafford as a whole and reflective of the relationship between the northern area and that of neighbouring authority areas, most notably SoT, NuL and SMDC and the ability of this area to meet adjoining housing needs if required.
43. Our comments in response to Section 1 highlight the importance of the northern area in the context of the Duty to Cooperate and therefore the role this area can play should be given due consideration as part of the settlement hierarchy and the extent to which this informs the wider development strategy in meeting future housing needs for Stafford (and/or adjoining areas), reflective of wider evidence base documents including a North Staffordshire Green Belt Review.

Question 5.F:

a) In respect of these potential spatial scenarios do you consider that all reasonable options have been proposed? If not what alternatives would you suggest?

44. Whilst the spatial scenarios considered by the Council and underpinned by the 'Stafford Borough Strategic Development Site Options: Reasonable Alternatives' assessment produced by AECOM (December 2019) are in their own right comprehensive, we do not agree with how these have been translated into the shortlist of locations for potential growth (as set out at in the table at Paragraph 5.34 of the Issues and Options Document).
45. This is on the basis that one of the basic principles underpinning the AECOM assessment is that the existing boundaries of the North Staffordshire Green Belt are not going to be the subject of a review. As a result, Section 3 of the AECOM assessment (Identification of Strategic Growth Options) and

¹ The Plan for Stafford Borough: Part 2 2011-2031 (Adopted 31 January 2017) paragraph 3.4 states "Eccleshall Local Centre is a key service centre in the rural area. It has a more substantial retail offer than any of the other Key Service Villages and consequently is regarded as a Local Centre."

the land suitability analysis contained within (in particular, Figure 3) discounts areas of land to the north of the Borough as being less suitable for development. Had the approach been Green Belt policy blind, Figure 5 demonstrates that large parts of the northern area of the Borough would be more favourably classified and sit within the proposed area of search which broadly follows a north-south axis through the Borough.

46. As set out in Section 1 of this Report, it is our view that an assessment of the North Staffordshire Green Belt should be undertaken in seeking to establish the extent to which areas of land in this area and contained within the Green Belt still fulfil the roles and purpose of being designated Green Belt.
47. Akin to this, we request that the AECOM assessment is updated to include the current designated Green Belt area and so that the extent of any potential additional growth locations can be established (for example, the potential to expand Barlaston to the north/east and/or extent the current settlement limits of SoT south into Stafford through a new sustainable urban extension to accommodate growth requirements in this area).
48. St. Modwen is promoting land in the north of the Borough which has strong linkages to the urban area further north (i.e. in SoT) and with places such as Barlaston, which form the backbone to the rural make-up of Stafford in this area. St. Modwen's land interests when considered alongside the area being promoted by Staffordshire County Council and assessed in the Council's (2018) SHELAA, could form an alternative option in the form of a further sustainable extension proposal. Such opportunities need to be properly considered in the context of the existing Green Belt and as part of AECOM's options assessment.
49. The potential spatial scenarios should also take account of the review to Tier 4 Large Settlements and the opportunity to prioritise/re-categorise the most sustainable settlements such as Eccleshall. Eccleshall has the potential for a sustainable urban extension and can play an increased role to enable growth to provide for improved sustainability of the settlement and best meet market needs in conjunction with Stafford, Stone and the North Staffordshire Urban Areas.

b) Are there any of these spatial scenarios that you feel we should avoid? If so, why?

50. Whilst the spatial portrait of the Borough includes a large rural community (comprising a number of smaller settlements), it does contain a County Town (Stafford), a secondary large town (Stone) and a number of Large Settlements / Key Service Centres, all of which to varying degrees score highly in terms of the provision of services, facilities and access to employment etc.
51. On this basis, we do not consider that the 'Dispersal of Development' scenario when taken in isolation to the other scenarios, is appropriate as this is unlikely to lead to a sustainable pattern of development; or address housing needs (where they are most prevalent) or provide new family and affordable homes with supporting infrastructure in the most suitable locations.
52. Furthermore, it is notable that when the Council prepared the adopted Local Plan, it consciously moved away from a dispersal approach to focus new growth and development in the main towns and key settlement areas. We have seen to evidence to suggest that re-establishing this approach is justified or appropriate.
53. With regards the 'Garden Communities' scenario as highlighted in Figure 5.1 of the Issues and Options Document, this would need to be in a fully justified in the proposed location; of a sufficient scale to support the provision of new infrastructure (social, physical and environmental); and, able to viably deliver a range of new homes and employment in an appropriate timeframe commensurate with the requirements of the plan (i.e. to meet housing and employment land

requirements early on and at a rate that does not lead to a shortfall in supply and/or in housing terms, a worsening of affordability).

c) Which of these spatial scenarios (or a combination) do you consider is the best option? Please explain your answer.

54. Subject to understanding:

- the extent to which new housing and employment land is required in particular locations (or not) across the Borough, including the potential requirement to address the needs of adjoining authorities, i.e. SoT;
- taking into account the findings of a recommended future Green Belt Review;
- alongside the review of the proposed Settlement Hierarchy;

we consider that a blended approach is required, which enables intensification around the edges of existing urban areas including the North Staffordshire Urban Areas such as Cocknage Road and/or the strategic extension of urban areas/sustainable settlements such as Eccleshall. We can see some merit in a string settlement/settlement cluster approach, however, as set out above, the development requirements of different locations across the Borough alongside an assessment of their current sustainability and capacity to accommodate future development, should underpin decisions about the need for and/or scale of new development regardless of the 'spatial scenario' and classification (as defined by AECOM) being applied.

Question 5.G: Do you consider that the consideration and utilisation of a new Garden Community / Major Urban Extension (or combination) would be helpful in determining the approach to satisfying Stafford Borough's future housing and employment land requirements? If you do think the Garden Community / Major Urban Extension approach is appropriate which of the identified options is most appropriate? Please explain your answer?

55. We have no objection to the principle of the plan-led strategy being underpinned by the development of a new Garden Community, Major Urban Extension and/or combination of these options, provided that the preferred spatial option(s) will:

- deliver at least the minimum number of homes and new employment land required in the plan period;
- meet housing, employment demand and market requirements;
- address evidence of local housing need across the Borough and not perpetuate issues of affordability, particularly in the early years of the plan (i.e. where larger scale developments are dependent upon upfront infrastructure being in place first);
- allow for flexibility to enable a range of other sites of a suitable scale to come forward in other sustainable locations, supporting the plans aims and objectives (as a whole);
- be demonstrably viable and deliverable; and
- be underpinned by a robust evidence base.

56. Paragraph 72 of the NPPF advises:

"the supply of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Working with the support of their communities, and with other authorities if appropriate, strategic policy-making

authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way.”

57. In doing so, they should inter alia:

- ensure that a variety of homes to meet the needs of different groups in the community will be provided; and,
- make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation.

58. We do not consider that it is possible to select a 'most appropriate' option at this stage.

Question 5.H:

i) Do you agree that the only NPPF-compliant Growth Options proposed by this document are No.3 (Disperse development across the new settlement hierarchy) and No.5 (Disperse development across the new settlement hierarchy and also at the Garden Community / Major Urban Extension) and No. 6 (Concentrate development within existing transport corridors)?

59. On the basis of our response to Question 5.F(a) and 5.G (above), the spatial scenarios and therefore potential location options need to be broadened to enables intensification around the edges of existing urban areas including the North Staffordshire Urban Areas such as Cocknage Road and/or the strategic extension of urban areas/sustainable settlements such as Eccleshall.
60. The outcomes of this exercise will likely change the blend of Growth Options presented in paragraph 5.36 of the Issues and Options Document and therefore on this basis, we do not currently consider that the only NPPF-compliant growth options are those that have been presented thus far.

ii) If you do not agree what is your reason?

61. Please see response to Question 5.H(i) above.

iii) Do you consider there to be any alternative NPPF-compliant Growth Options not considered by this document? If so, please explain your answer and define the growth option.

62. For the reasons set out in response to Questions 5.F, 5.G and 5 H above, the development of additional growth options needs to be informed by a Green Belt Review and further consideration to Tiers 3 and 4 of the settlement hierarchy. The outcomes need to be fed through the AECOM development options appraisal work. We consider that this would likely result in a further series of spatial options being identified, which include the expansion of the existing urban areas in and around the north of the Borough (i.e. on the edge of SoT and/or to the north east of Barlaston and Eccleshall). Such spatial options would then need to be incorporated into the Growth Options presented in Paragraph 5.36 having regard to the proposed revised settlement hierarchy and other evidence base documents available.

Question 5.I: Do you think that it is appropriate, in order to take the development pressure off the existing settlements in the Settlement Hierarchy, that at least one Garden Community should be incorporated into the New Local Plan? Please explain your answer.

63. Any proposal to develop a new Garden Community should be underpinned by robust evidence as to how such development will meet identified needs in a sustainable way in an appropriate timescale (as per the requirements of the NPPF).
64. The PPG (Paragraph 60, Section 61) is clear that strategic policy-making authorities will need to be able to demonstrate that there is a reasonable prospect that such large scale developments can come forward (based on realistic assumptions and delivery rates) and that such an approach will deliver on the plans' overall aims and objectives.
65. At this stage, we consider that further evidence is required before it can be concluded that 'at least one Garden Community should be incorporated into the new Local Plan'.

Question 5.J: What combination of the four factors:

1. Growth Option Scenario (A, D, E, F, G);

2. Partial Catch Up

3. Discount / No Discount

4. No Garden Community / Garden Community

should Stafford Borough Council put forward as its Preferred Option at the next stage of this Plan-making process?

66. As set out in our responses to earlier questions in this section, we consider that the following parameters need to underpin any Preferred Option for the new local plan:
 - Application of the standard methodology as a starting point to calculate the minimum housing requirement but with Growth Option Scenario's E and G more accurately supporting what we understand to be the Council's future housing and economic vision;
 - Inclusion of a Partial Catch-up Rate;
 - Discounting only sites which are under construction; sites which have planning permission and/or current allocated sites which are yet to come forward, should be reassessed in terms of their deliverability and developability (against the requirements of paragraph 67 of the NPPF) as part of the overall plan strategy, alongside any new sites identified pursuant to the 'Call for Sites' process and/or Strategic Housing Land Availability Assessment (SHLAA);
 - We do not consider it appropriate at this stage to determine whether the provision of a new Garden Community either is or is not appropriate or necessary

5 SECTION 7 (TOWN CENTRES AND FUTURE NEEDS)

Question 7.A

(a) Do you consider that the hierarchy for Stafford Borough should consist of Stafford and Stone town centres with Eccleshall local centre?

67. The retail hierarchy should consist of Stafford, Stone and Eccleshall which reflects their role and function in terms of access to shops, facilities, leisure services and employment. Eccleshall is rightly referenced as a centre that performs well with a good range of uses and low vacancy rate which should be maintained to serve day-to-day needs of the local population. The current plan recognises that Eccleshall has a more substantial retail offer than any of the other Key Service Villages and should play an increased role in meeting future needs.

6 SECTION 8 (DELIVERING HOUSING)

Question 8.A: Should the Council continue to encourage the development of brownfield land over greenfield land?

68. The NPPF encourages local authorities through their strategic policies to make clear how it will accommodate objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land. The new local plan should continue to encourage the re-use of brownfield land as and when this is available, such as the allocation of the former Alstom / GE site at Lichfield Road, Stafford for residential use, but whilst also recognising that in order to meet evidence of future economic and housing needs, greenfield land will be required.

Question 8.B: Do you consider that the enforcement of minimum density thresholds would have a beneficial impact on development within the Borough? If so do you consider:

i) the implementation of a blanket density threshold; or

ii) a range of density thresholds reflective of the character of the local areas to be preferable?

Why do you think this?

69. The application of a minimum density threshold, whether on a blanket or ranged basis, is not appropriate. National policy objectives to make the best use of land whilst meeting identified needs can be served through a requirement for individual proposals to justify their density through reference to local character, townscape and other relevant considerations. This will ensure that best use is made of every piece of land on an individual basis, rather than through reference to a threshold which might not be optimal for each specific site.

Question 8.E – In the New Local Plan should the Council a) Apply the Nationally Described Space Standards to all new dwellings, including the conversion of existing buildings? b) Only apply the Nationally Described Space Standards to new build dwellings? c) Not apply the Nationally Described Space Standards to any development?

70. The Nationally Described Space Standards can be useful in helping to deliver high quality development, but they should not be applied rigidly across all new dwellings and conversions. Their use would need to be justified in terms of viability and the implications this could have for housing supply. If adopted they should be used as a guide alongside other policies around good design and amenity so that each proposal can be assessed on a site-specific basis. Flexibility is required, and this is particularly relevant for brownfield and more constrained sites including the conversion of properties in a heritage context.

7 CONCLUDING REMARKS

71. We welcome the Council's decision to undertake a full review of its Local Plan and to plan for its future housing and employment land requirements over the next 20 years.
72. In doing so, however, we do consider that further evidence base work is required to supplement the options appraisal work undertaken to date and before a Preferred Option can be determined (both in terms of housing and employment land requirements and spatially where development ought to be located).

North Staffordshire Green Belt Review

73. In particular, we consider that the need for development within the currently designated North Staffordshire Green Belt should be duly considered, not least, to inform discussions between the Council and neighbouring authorities (notably SoT, NuL and SMDC) to satisfy the legal requirements of the Duty to Co-operate.

Settlement Hierarchy

74. The settlement hierarchy needs further evaluation. It needs to reflect the development strategy options which omits a review of the North Staffordshire Green Belt. The North Staffordshire Urban Areas is Tier 3 but unable to play any meaningful role in meeting future development needs. The identification of the Tier 4 Large Settlements is not appropriate as they are not considered to have similar characteristics with Eccleshall performing an increased function and role which needs to have greater status in the settlement hierarchy.

Garden Community / Major Urban Extension

75. A Garden Community / Major Urban Extension is an option if it can be viable and demonstrably deliver the homes, based on identified needs, necessary employment and facilities/services which will be essential to make it a sustainable option.

Growth Options

76. In terms of the growth options presented, we consider that the following parameters need to underpin any Preferred Option for the new local plan:
 - Application of the standard methodology as a starting point to calculate the minimum housing requirement but with Growth Option Scenario's E and G more accurately supporting what we understand to be the Council's future housing and economic vision;
 - Inclusion of a Partial Catch-up Rate;
 - Discounting only sites which are under construction; sites which have planning permission and/or current allocated sites which are yet to come forward, should be reassessed in terms of their deliverability and developability (against the requirements of paragraph 67 of the NPPF) as part of the overall plan strategy, alongside any new sites identified pursuant to the 'Call for Sites' process and/or Strategic Housing Land Availability Assessment (SHLAA);
77. In terms of how spatially these growth requirements can be addressed, we consider that a blended approach is likely to be required, which enables intensification around the edges of existing urban areas and/or the strategic extension of urban areas/sustainable settlements.
78. We can see some merit in a string settlement/settlement cluster approach, however, as set out above, the development requirements of different locations across the Borough alongside an

assessment of their current sustainability and capacity to accommodate future development, should underpin decisions about the need for and/or scale of new development regardless of the 'spatial scenario' and classification (as defined by AECOM) being applied.

79. We would welcome the opportunity to discuss our representations in further detail should this assist.

Appendix 1

Lichfield Road Stafford - Site Location Plan

Appendix 2

Cocknage Road - Site Location Plan

Appendix 3

'Call for Sites' submission (January 2018)

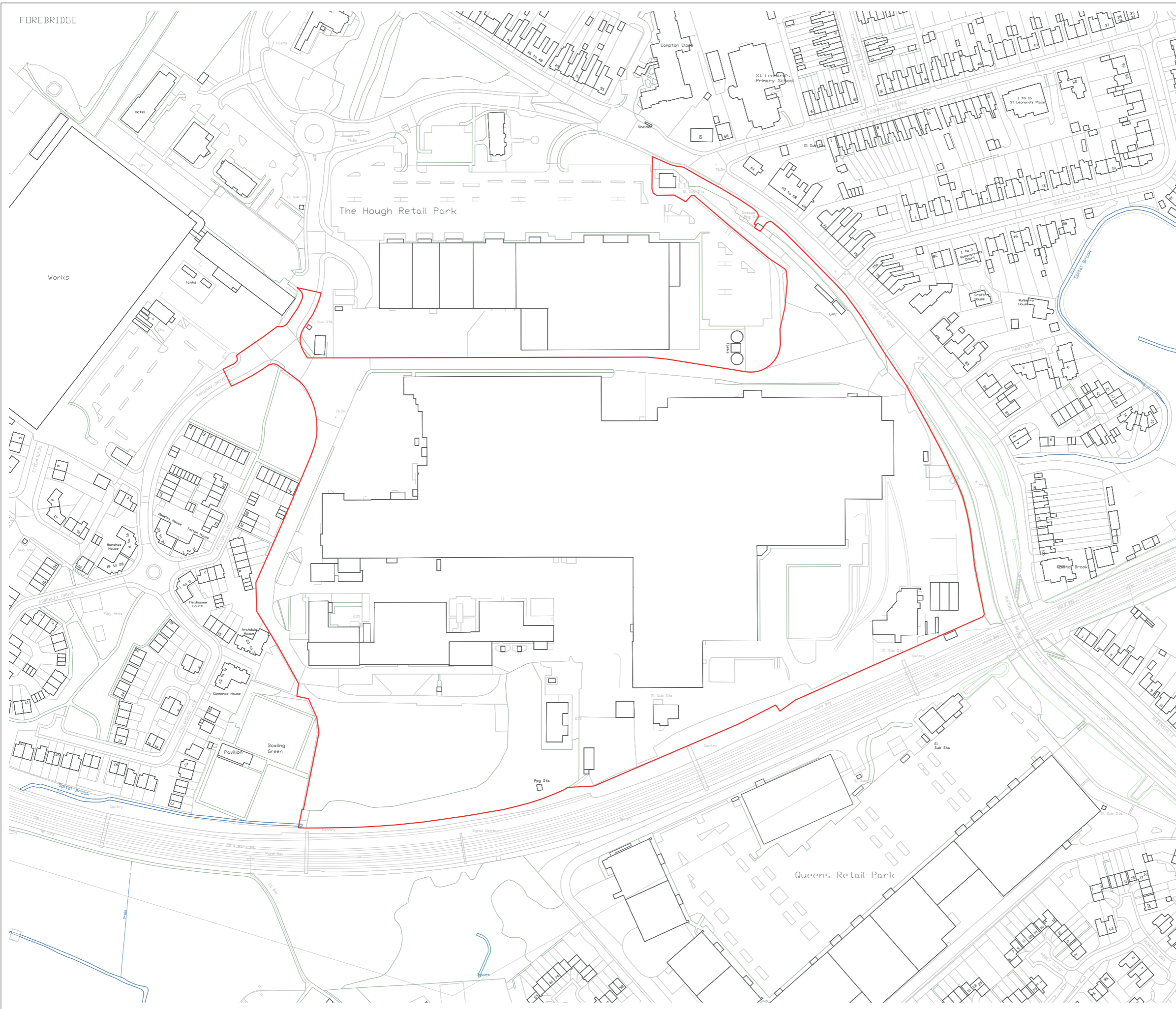
Appendix 4

Staffordshire County Council SHELAA (2018)

Site ID: BAR03

Appendix 5

Extract of Duty to Co-operate Statement of Common Ground (Staffordshire Moorlands District Council)



- Notes**
1. Do not scale off this drawing.
 2. Drawing to be read in conjunction with all other drawings and specifications forming part of the project package.
 3. This drawing must not be copied in whole or in part without prior written consent of Optimised Environments Ltd.



Planning application site boundary (12.46ha)



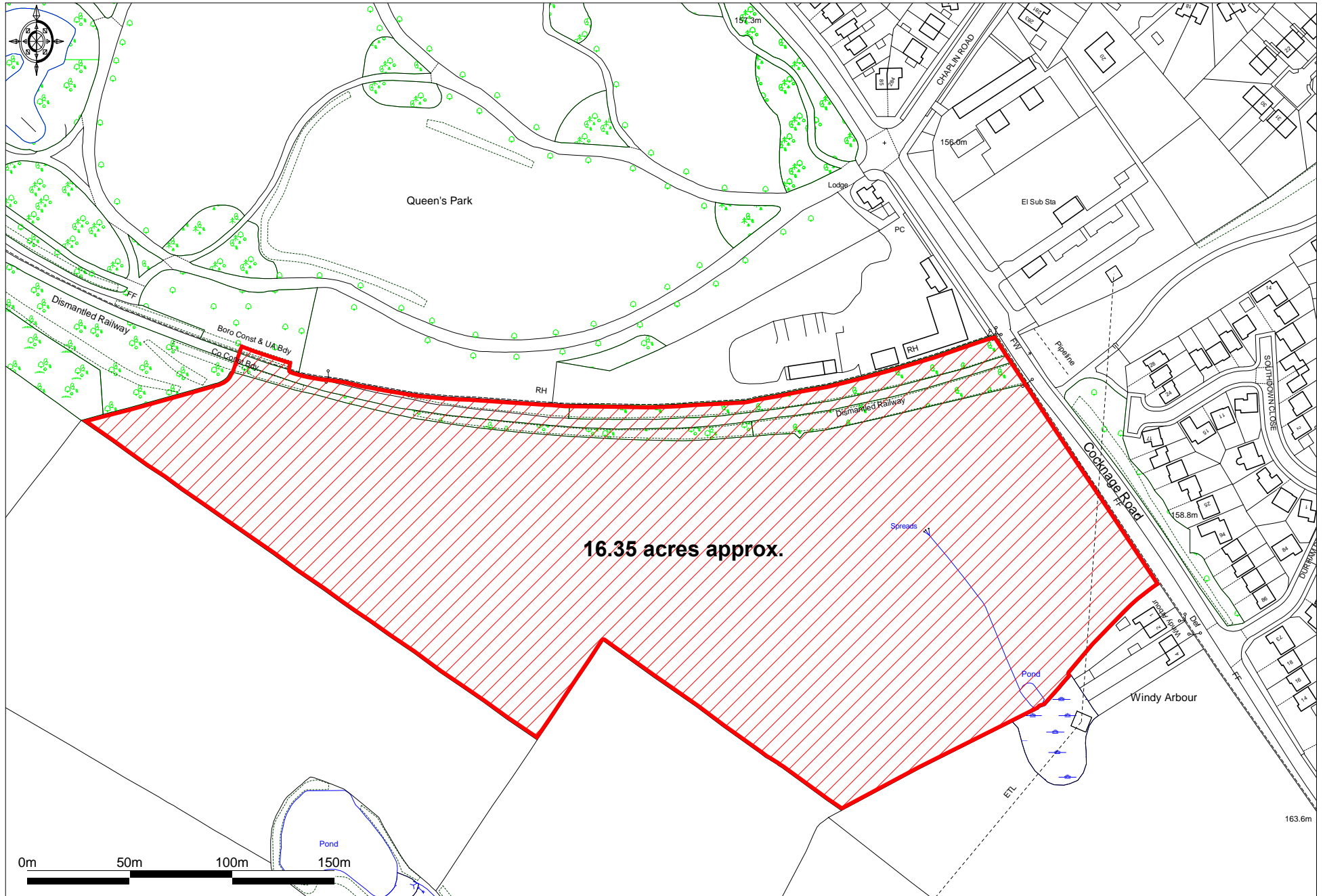
Client
St Modwen

Project
Land at Lichfield Road, Stafford

Drawing title
Site location 1:2500

Scale	1:2500@A3	Date	Feb 2020
By	KZ	Status	Outline Planning
Checked	MB	Approved	MB
Dwg no.	M90205_001_Location_1-2500	Rev	-

Land at Cocknage Road, Stoke-on-Trent. ST3 4AW
Land to be retained shown edged red and hatched red



Cocknage, Staffordshire County Council, County Farm, ST3 4AW

Deliverability Summary

Ward: Barlaston

Available: The site is available immediately.

Parish: Barlaston

Suitable: No; the site is not within or adjacent to a currently recognised Local Plan settlement. The site is positioned within the Green Belt.

Potential Yield: 4,082

Achievable: The site is achievable

Greenfield or Brownfield:
Greenfield

Status: Not currently developable. A review of the adopted Sustainable Settlement Hierarchy and the Green Belt would be required to remove the constraint.

Description:

The site is 194.4 hectares, and is currently used for agricultural purposes.

Availability Assessment

Some of the necessary infrastructure is considered to be available within the locality. There are no known legal or ownership issues, and the site is available immediately.

Suitability Assessment

The site is not situated within or adjacent to a currently recognised Local Plan settlement. The following constraints exist: Current user will need to be relocated, Green Belt, Public Right of Way, landfill buffer.

Achievability Assessment

The site is classified as CIL typology RUR1, which is considered financially viable.



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Appendix 1 - Statements of Common Ground

Statement of Common Ground between Staffordshire Moorlands District Council, Stafford Borough Council, Stoke-on-Trent City Council and Newcastle-under-Lyme Borough Council ⁽⁴⁾

Statement of Common Ground between Staffordshire Moorlands District Council, Stafford Borough Council, Stoke-on-Trent City Council and Newcastle-under-Lyme Borough Council

This Statement of Common Ground establishes a framework for co-operation between Staffordshire Moorlands District Council, Stafford Borough Council, Stoke-on-Trent City Council and Newcastle-under-Lyme Borough Council. It primarily relates to the preparation of Development Plans and also sets out a framework for future collaboration on identified strategic cross boundary planning issues. It is made within the context of the Duty to Co-operate as required under Section 110 of the Localism Act 2011.

1. Purposes

- a. To establish areas of agreement in relation to strategic planning and development matters between the four local planning authorities
- b. To identify areas where further work is required
- c. To set the framework for future co-operation, including the monitoring and project management of required works

2. Planning Context

- 2.1 Staffordshire Moorlands District Council adopted a Core Strategy in March 2014. An early review of the Core Strategy, combined with site allocations, is now being prepared to provide the District with a single Local Plan to cover the period 2016 to 2031.
- 2.2 Stafford Borough Council adopted the Plan for Stafford Borough (Part 1) in June 2014, with Part 2 adopted in January 2017, covering the period 2011 to 2031. In July 2017 the Council commenced the New Local Plan process to cover the period 2020 to 2040, with the Issues & Options stage in July 2018.
- 2.3 Stoke-on-Trent City Council and Newcastle Borough Council are in the process of preparing a Joint Local Plan to cover the period to 2033. A Preferred Options consultation document was published in February 2018.

3. Area

- 3.1 The local planning authority areas of Staffordshire Moorlands District Council, Stafford Borough Council, Stoke-on-Trent City Council and Newcastle-under-Lyme Borough Council. For the avoidance of doubt, this excludes the parts of Staffordshire Moorlands District that lie within the Peak District National Park. Stoke-on-Trent City Council and Newcastle-under-Lyme Borough Council are in the process of preparing a Joint Local Plan. All four authorities share boundaries with one another, are located within Staffordshire and are located to the north and west of the county. Information considered in the preparation of Local Plans relating to housing, gypsies and travellers, employment and Green Belt which supports the establishment of this geographic area:

Strategic Housing Market Assessments (SHMA)

Stafford Borough SHMA (2012)

- 3.2 Stafford Borough Council published a Strategic Housing Market Assessment in September 2012 as part of the evidence for the Plan for Stafford Borough 2011-2031 providing the total number of future market and affordable households based on housing and population forecasts. In conclusion the provision requirement is 500 new homes each year in Stafford Borough to fully meet the Objectively Assessed Need of which 210 affordable houses are required.
- 3.3 Between 2000 and 2011 the median house prices have increased by 151% with 87% being owner occupied / private rented and 13% social rented. Almost 75% of properties are houses, with 11% being flats, 11% bungalows and 3% others. The population of Stafford Borough will increase from 130,800 in 2011 to 146,000 by 2035, with over 85 year olds increasing by 45% and over 75 year olds by 102% during this period. In terms of household moves 62.9% took place within Stafford Borough so the area is not self-contained in terms of migration, which shows strong linkages with Stoke-on-Trent and Cannock Chase.
- 3.4 The Strategic Housing Market Assessment will be updated through the New Local Plan.

Staffordshire Moorlands SHMA (2014) and Update (2017)

- 3.5 In terms of the definition of the Housing Market Area, the 2014 SHMA found that excluding long-distance movements, the District has a self-containment of between 60% – 61%. Although the former CLG Guidance recognises that the level of self-containment in rural authorities is often lower than elsewhere, it could not be argued that Staffordshire Moorlands represents a self-contained HMA. Consideration given to the objectively assessed need for housing, including affordable housing was also given but subsequently superseded by the 2017 Update.
- 3.6 The 2017 Update was undertaken to reflect the 2014-based household projections and new employment forecasts provided by Experian and Oxford Economics. The extent of the Housing Market Area was not re-visited. The study identified an objectively assessed need for 235 to 330 homes per year to the year 2031. The bottom of the range (235) relates to the demographic needs. The top of the range (330) relates to the level of housing growth required to support the projected increase in jobs by addressing the projected decline in the working age population. A net annual need for affordable housing of 224 to 432 homes per year was also identified.

Stoke-on-Trent and Newcastle-under-Lyme SHMA 2015 and Update 2017

- 3.7 Stoke-on-Trent and Newcastle-under-Lyme published an updated Strategic Housing Market Assessment in July 2017 as part of the evidence for the Joint Local Plan Strategic Options consultation. The plan period is 2013 – 2033 with the SHMA providing evidence over a longer period to 2039 and incorporating the release of the 2014-based population and household projections and Cambridge Econometrics Jobs forecasts.

- 3.8 In terms of the definition of the Housing Market Area, the 2015 SHMA found that Stoke-on-Trent and Newcastle-under-Lyme collectively formed a single Housing Market area based on migration and containment of moves. A high proportion of labour is also retained within the two authorities and there are similarities in house prices. However, the SHMA (Appendix 2) also highlighted the complex nature of local geographies and recognised that both authorities share a strong relationship with Stafford Borough, Cheshire East and Staffordshire Moorlands, with a notable rate of out migration from the two authorities to these authorities. In this respect the 2011 Census shows that when moves from Newcastle-under-Lyme and Stoke-on-Trent to the Staffordshire Moorlands are taken into account the level of containment within this geography is 77% (surpassing the 70% threshold in the PPG). Nevertheless, this relationship is weaker than that shared by Stoke-on-Trent and Newcastle-under-Lyme.
- 3.9 The 2017 update was undertaken to consider the findings from the ELR finalised in December 2015, particularly the forecast level of job growth and labour force availability, as well as the release of new 2014-based sub-national population and household projections in May and July 2016. The extent of the Housing Market Area was not revisited.
- 3.10 The updated analysis indicated that there is an objectively assessment need (OAN) for 1,390 dwellings per annum in the Newcastle-under-Lyme and Stoke-on-Trent housing market area (HMA), this sits within the range previously concluded in the 2015 SHMA (1,177 – 1,504 dwellings per annum). The total requirement over the plan period is a need for 27,800 dwellings (16,080 within Stoke-on-Trent and 11,720 within Newcastle-under-Lyme).
- 3.11 In respect of Newcastle-under-Lyme the study recommended a housing requirement of 586 per annum per year to the year 2039 to support the projected increase in employment growth. In respect of Stoke-on-Trent the study recommended a housing requirement of 804 dwellings per annum to 2039 to support the projected increase in employment growth.
- 3.12 The update also recognises an updated calculated annual need for 453 affordable homes across both Stoke and Newcastle-under-Lyme over the next five years to clear the backlog and meet newly arising need over the next five years (242 Newcastle-under-Lyme and 210 Stoke-on-Trent) with this reducing to 265 affordable homes per annum thereafter (199 Newcastle-under-Lyme and 66 Stoke-on-Trent) once the backlog is cleared.

Newcastle-under-Lyme, Stoke-on-Trent, Staffordshire Moorlands and Stafford Gypsy and Traveller and Travelling Showperson Accommodation Assessment (2015)

- 3.13 The assessment was jointly commissioned by the four authorities. The identified need, as at 2015, for pitches was as follows in Table 1. However the latest position is set out on Page 9 within the section 'Gypsies, Travellers and Travelling Showpeople'.

Table 1: Summary of overall pitch and plot requirements over five years and up to 2033/34

District/Local Planning Authority		Gypsy and Traveller Pitch requirements	Showperson Plot requirements
Newcastle-under-Lyme	5 yr shortfall 2014/15 to 2018/19	1	0
	2019/20 to 2033/34*	7	0
Stoke-on-Trent	5 yr shortfall 2014/15 to 2018/19	22	0
	2019/20 to 2033/34*	16	0
Staffordshire Moorlands	5 yr shortfall 2014/15 to 2018/19	6	0
	2019/20 to 2033/34*	2	0
Stafford Borough	5 yr shortfall 2012/13 to 2016/17	19	0
	2017/18 to 2026/27*	24	0
Total	5 yr shortfall 2014/15 to 2018/19	48	0
	2019/20 to 2033/34*	48	0

Table 2: Summary of transit requirements 2014/15 to 2018/19

Authority	Five year pitch requirement (single van use)	Total maximum caravans with towing vehicles that could be accommodated
Newcastle-under-Lyme	5	10
Stoke-on-Trent	5	10
Staffordshire Moorlands	-	-
Stafford Borough	-	-
Total	10	20

Employment Land Reviews

Stafford Borough Employment Land Review

- 3.14 Stafford Borough Council published an Employment Land Review in 2012 as part of the evidence for the Plan for Stafford Borough 2011-2031 which concluded that 160 hectares of employment land is required for the area at 8 hectares per year.
- 3.15 Stafford has median earnings of £26,603 per year with 68.2% of people living and working in the Borough. Of the 31.8% working outside the Borough, 8.5% work in Stoke-on-Trent whilst 19.2% work elsewhere in the West Midlands and 4.2% beyond.
- 3.16 The 2011 Census data shows that 67% of residents live and work in Stafford Borough so therefore the area is part of a broader functional market area with the strongest links being to Stoke-on-Trent.
- 3.17 The Economic Development Needs Assessment will be produced for the New Local Plan.

Staffordshire Moorlands Employment Land Review (2014) and update (2017)

- 3.18 In terms of the Functional Economic Area for the District, the study concluded that it would fall within the wider economic area of Stoke-on-Trent, within which some 76% of the District's economically active residents work. The need for employment land was also considered in the report but this was subsequently updated in 2017 to take account of new data.

- 3.19 The 2017 Update identified an objectively assessed need employment land of 13 to 27ha up to the year 2031. The upper end of this range corresponds with the top of the assessed need for housing to provide a consistent approach and was derived by consideration of Experian and Oxford Economics jobs forecasts. Development at the top of each range would support approximately 800 additional jobs in the District up to the year 2031.

Newcastle-under-Lyme and Stoke-on-Trent Joint Employment Land Review (2015)

- 3.20 The Newcastle-under-Lyme and Stoke-on-Trent Joint Employment Land Review 2015 concluded that Stoke-on-Trent and Newcastle-under-Lyme together comprise a Travel to Work Area and a Functional Economic Market Area. Stoke-on-Trent remains a net importer of labour, with a net total of 6,108 in-commuters according to the 2011 Census. In contrast, Newcastle-under-Lyme is a net exporter of labour, with a net total of 8,058 out-commuters. Very strong commuting relationships exist between Stoke-on-Trent and Newcastle-under-Lyme and at the same time it acknowledged the strong commuting relationships with Stafford Borough, Staffordshire Moorlands and Cheshire East.
- 3.21 Stoke-on-Trent and Newcastle-under-Lyme's employment space is still dominated by industrial uses which account for around 70% of total employment floorspace. Whilst this is increasing in Newcastle-under-Lyme, the level of industrial stock in Stoke-on-Trent has been declining for a number of years. The 2015 study identified that for Stoke-on-Trent between 146 Ha and 201 Ha was identified as being required over the 26 year plan period to 2039. For Newcastle-under-Lyme between 44 ha and 133 ha was identified as being required to 2039. Across the FEMA overall the forecasting suggests a need for between 190 Ha and 334 Ha over the 26 year plan period.
- 3.22 Following the 2015 study a SHMA update was carried out in 2017 which linked housing and employment evidence to ascertain an Objectively Assessed Need and therefore narrow down on the range that was set out in the ELR. This identified that the OAN for employment land requirements, based on the most appropriate forecasting for the area – Cambridge Econometrics was that a requirement of 199 Ha of employment land was required across the plan area to 2033 (131 Ha in Stoke-on-Trent and 68 Ha in Newcastle-under-Lyme). This amount of employment land would support in the region of 17,372 jobs (approximately 869 new jobs per annum).
- 3.23 Both Councils have been reviewing employment land monitoring information from 2013 to 2017 and the evidence from 2013 to 2017 and the evidence provided by the Joint Employment Land Review 2015 to determine how much employment land could be delivered in order to support the provision of more and better quality jobs. The total employment land supply is summarised in the table below.

	Hectares of Employment Land		
	Newcastle under-Lyme	Stoke-on-Trent	Joint Local Plan area
New employment land developed between 2013 and 2017	4	37	41
Vacant land with planning approval for new employment development at 1 April 2017	29	87	116
Other land from the Employment Land Review (2015) which is considered to be suitable and could be allocated for employment development:	30	43	73
Total Potential Employment Land Supply:	63	167	230

North Staffordshire Green Belt

3.24 The North Staffordshire Green Belt was approved by Staffordshire County Council in 1967, and by extension the North Staffordshire Green Belt Local Plan (June 1983) to prevent the coalescence of town and villages around the Potteries.

Stafford Borough

3.25 The adopted Plan for Stafford Borough 2011-2031 (June 2014) identifies the Green Belt boundaries for the Borough, located to the north of Stone forming part of the North Staffordshire Green Belt area and south east of Stafford as part of the West Midlands Green Belt area. As there is sufficient land to serve the development needs of Stafford Borough outside of these Green Belt areas no safeguarded land or boundary changes have been identified. However Policy E5 does identify Major Developed Sites in the Green Belt at Hadleigh Park, Moorfields Industrial Estate and the former Meaford Power Station site where employment uses are supported on previously developed areas.

3.26 The North Staffordshire Green Belt will be maintained through the New Local Plan in line with the national policy position and the local context.

Staffordshire Moorlands

3.27 In Staffordshire Moorlands, the 1998 Local Plan replaced the North Staffordshire Green Belt Local Plan and made amendments to the inner boundaries of the Green Belt around Blythe Bridge, associated with the construction of the A50 which created enclosed land which could be readily parcelled for development. During the consideration of the adopted Staffordshire Moorlands Core Strategy, the planning inspector acknowledged that a comprehensive review of the Green Belt would be required in order to support housing growth Biddulph to be identified in a Site Allocations DPD. In turn, Staffordshire Moorlands Green Belt Review (2015) has identified numerous sites which may be suitable for release from the Green Belt in exceptional circumstances. The review has informed the preparation of the new Staffordshire Moorlands Local Plan with Green Belt release proposed in Biddulph, Werrington and Cheadle.

Stoke-on-Trent and Newcastle-under-Lyme

- 3.28 A Joint Green Belt Assessment has been prepared in respect of the areas within Newcastle-under-Lyme and Stoke-on-Trent City Council designated as Green Belt. Approximately 45% of Newcastle-under-Lyme's area is designated as Green Belt. The Assessment forms part of the evidence base for the emerging Joint Local Plan.
- 3.29 The purpose of the Green Belt Assessment was to provide Stoke-on-Trent and Newcastle-under-Lyme with an objective, evidence-based assessment of how the Green Belt contributes to the five purposes of Green Belt set out in the National Planning Policy Framework (NPPF). The assessment considers the history and origins of the Stoke-on-Trent and Newcastle-under-Lyme Green Belt and how it has evolved since its inception. It provides a review of current national policy and guidance and carries out a two stage assessment:
- Stage 1 involves dividing the whole Green Belt into General Areas and assessing them against the five purposes of the Green Belt;
 - Stage 2 involves defining smaller greenbelt parcels adjacent to the urban areas and inset settlements, and assessed as making a weak, moderate or strong contribution.
- 3.30 In total 15 General Areas were assessed as part of Stage 1 and a further 186 parcels were assessed at Stage 2. The Green Belt Assessment was published in November 2017 as evidence for the Joint Local Plan Preferred Options Consultation.
- 3.31 In Newcastle-under-Lyme the preferred options consultation document showed that additional housing and employment land is required beyond the existing supply within Newcastle-under-Lyme. This situation forms part of the exceptional circumstances evidence behind a proposal to release sites in the Green Belt within Newcastle-under-Lyme, within the vicinity of Keele University Campus and the Keele University Science and Innovation Park and sites at Kildgrove, Talke and Chesterton.
- 3.32 In Stoke-on-Trent the Joint Local Plan Preferred Options Consultation (para. 4.3) states that it is not considered justifiable to go into the Green Belt for the delivery of development as the current requirements (in line with the SHMA 2017) can be met within the City Council's urban area. However it is considered that some very minor amendments to the boundaries within Stoke-on-Trent may be required to align the Green Belt boundary with the latest Ordnance Survey base and technological advancement in mapping. This will be set out at the Draft Joint Local Plan stage.

4. Strategic cross boundary matters

- 4.1 The following are agreed by the four authorities as being strategic cross boundary matters which require co-operation:
- a. Working towards meeting development requirements
 - i. Housing – the provision of housing across the four local planning authority areas
 - ii. Gypsies, Travellers and Travelling Showpeople – provision for accommodation
 - iii. Employment – the provision of employment across the four local planning authority areas
 - b. Co-ordination of shared infrastructure
 - a. Green Infrastructure
 - b. Traffic growth on A50
 - c. Education

- c. Green Belt –co-operation on the approach to Green Belt
 - d. Constellation Partnership – co-operation on any future joint strategy in support of the potential HS2 hub at Crewe
 - e. Blythe Vale Strategic Allocation – consideration of the cross boundary implications of the allocation as identified in the proposed Staffordshire Moorlands Local Plan
5. Agreed matters

Working towards meeting development requirements

Housing provision

- 5.1 The proposed Staffordshire Moorlands Local Plan makes provision for an average annual development of 320 dwellings up to the year 2031. This is towards the top of the range of the objectively assessed need for housing identified for the District in the 2017 SHMA Update (235 to 330dpa). This is supported by Green Belt release to enable housing growth in Biddulph and the Rural Areas. There is a shortfall of 190 homes from the top of the objectively assessed need range over the period 2012 to 2031.
- 5.2 Staffordshire Moorlands District Council is unable to accommodate any potentially arising unmet housing needs from neighbouring authorities due to development constraints. In particular, the supply of land in the District is limited by Green Belt which should only be released in exceptional circumstances. Furthermore, the District also partly lies within the Peak District National Park
- 5.3 The adopted Plan for Stafford Borough makes provision for an average annual development of 500 dwellings up to the year 2031 in accordance with the objectively assessed need for housing identified for the Borough in the 2012 SHMA. Housing growth is focussed at Stafford and Stone on large-scale Strategic Development Locations as well as being delivered across a number of Key Service Villages. Since 2011 a total of 3,337 new homes have been completed with 3,509 having planning consent. Stafford Borough currently has more than a 5 year supply of housing land.
- 5.4 In February 2018 Staffordshire Moorlands District Council made a request to Stafford Borough to assist with meeting the shortfall of 190 new homes. However based on this need having to be met within the relevant Housing Market Area, the adjoining area between Stafford Borough and Staffordshire Moorlands is contained within the North Staffordshire Green Belt and therefore delivery is severely constrained in this area. At this stage no request has been received from the City of Stoke-on-Trent Council or Newcastle-under-Lyme Borough Council to accommodate any unmet housing needs within Stafford Borough, although it is noted that the Joint Local Plan currently has a shortfall of over 1,200 new homes compared to deliverable sites
- 5.5 Taking into account the Joint Local Plan evidence base Newcastle-under-Lyme Borough Council has published for consultation purposes, with Stoke-on-Trent City Council, a preferred growth strategy which seeks to provide for 11,720 homes over a twenty year plan period between 2013 and 2033 within Newcastle-under-Lyme. However, within the urban area of Newcastle-under-Lyme the Borough Council can only demonstrate delivery of 6,611 dwellings against this requirement. The Council has therefore proposed and consulted on the release land within the Green Belt to help meet its housing needs. At this stage the Council has identified sites within the

Green Belt with a capacity of 3,010 dwellings. The total delivery against the requirement is 9,621 (82% of their apportionment) leaving a shortfall of -2099. Between, 1 April 2013 and 31 March 2017, 1,080 homes have been completed in the borough.

- 5.6 Taking into account the Joint Local Plan evidence base Stoke-on-Trent City Council has a housing need requirement of 16,080 dwellings which is the city council's appointment of the joint plan area's requirement of 27,800 dwellings. The city council has published for consultation purposes, with Newcastle-under-Lyme Borough Council, a preferred options growth strategy which seeks to deliver 16,892 homes over a twenty year plan period between 2013 and 2033 within Stoke-on-Trent (105% of their appointment). How this supply is calculated is set out at paragraph 2.76 of the Preferred Options Consultation Document. Between 1 April 2013 and 31 March 2017, 2,235 homes have been completed in the city.
- 5.7 Stoke-on-Trent City Council and Newcastle-under-Lyme Borough Council are both unable to assist in meeting SMDC's housing development requirements due to the fact that the Stoke-on-Trent and Newcastle-under-Lyme Joint Local Plan is in the early stages of preparation.
- 5.8 The councils are still gathering evidence and have just completed a consultation on the Preferred Options which aims to meet the needs of the Joint Local Plan area. The Joint Local Plan will need to be at a more advanced stage before the councils can consider the needs of adjoining authorities as the Joint Local Plan Preferred Options consultation identifies a shortfall in housing supply within the Housing Market Area of Newcastle-under-Lyme and Stoke-on-Trent and which would need to be resolved before the consideration of housing need arising from Staffordshire Moorlands could be considered.
- 5.9 All four authorities will liaise on future consideration and evidence gathering in relation to housing requirements and provision undertaken as part of future plan making.

Gypsies, Travellers and Travelling Showpeople

- 5.10 The Gypsy and Traveller and Travelling Showperson Accommodation Assessment (2015) identified the requirement as identified in this Statement of Common Ground.
- 5.11 There are 4 pitches in Staffordshire Moorlands. The residual requirement for pitches in the period 2014/15 to 2018/19 in the District is 3.
- 5.12 The proposed Staffordshire Moorlands Local Plan does not identify any land to accommodate the identified needs due to a lack of suitable and available land. Policy H4 of the Core Strategy and emerging Local Plan will help to deliver the shortfall in pitches through the determination of appropriate windfall sites
- 5.13 Staffordshire Moorlands District Council is unable to accommodate any potentially arising unmet needs from neighbouring authorities due to the lack of available land.

- 5.14 There are currently 69 households living on Gypsy and Traveller pitches in Stafford Borough, 12 pitches on a Local Authority site and 56 on authorised sites alongside 8 unauthorised.
- 5.15 The Plan for Stafford Borough Part 2 identifies current new provision for 43 pitches over the period 2011 to 2027 of which 36 new pitches having planning consent at St Alban's Road, Stafford. There is an unidentified need for 7 pitches which will be delivered through windfall sites over the Plan period in line with Policy C7 of the adopted Plan for Stafford Borough.
- 5.16 The Stafford Borough New Local Plan will allocate a new gypsy site to meet requirements through to 2040 but will be unable to accommodate any potentially arising unmet needs from neighbouring authorities due to the lack of available land despite having a request from Staffordshire Moorlands District Council to do so in February 2018. Stafford Borough will need to update the Gypsy and Traveller and Travelling Showperson Accommodation Assessment through the New Local Plan either jointly with neighbouring authorities or independently.
- 5.17 The Joint Gypsy and Traveller and Travelling Showperson Accommodation Assessment (2015) identifies a shortfall of one pitch between 2014 and 2019 for Newcastle-under-Lyme. A further six pitches are required between 2019 and 2034, bringing the total requirement to seven permanent pitches. In addition to the provision of permanent pitches, the study identifies the requirement to plan for five transit pitches across Newcastle-under-Lyme between 2015/16 and 2018/19.
- 5.18 Within Stoke-on-Trent the Joint Gypsy and Traveller and Travelling Showperson Accommodation Assessment (2015) identifies a shortfall of 22 pitches between 2014 and 2019 and a further requirement for 16 pitches between 2019 and 2034, bringing the total requirement to 38 permanent pitches. In addition to the provision of permanent pitches, the study identifies the requirement to plan for five transit pitches across Stoke-on-Trent between 2015/16 and 2018/19.
- 5.19 Stoke-on-Trent City Council and Newcastle-under-Lyme Borough Council have cooperated on the preparation of a Joint methodology to identify the provision of pitches. Preparations are underway to consult on the Joint methodology and potential land to accommodate the requirement later in 2018. Therefore, at this stage the borough council is not in a position to identify suitable and/or available land within Newcastle-under-Lyme to accommodate its needs, or the needs of other local authorities. However, the shortfall of housing and employment land within Newcastle-under-Lyme means that the borough council is unable to accommodate any potentially arising unmet gypsy and traveller needs from neighbouring authorities due to a lack of available land.

Employment provision

- 5.20 The proposed Staffordshire Moorlands Local Plan makes provision for 27ha of employment land up to the year 2031. This is the top end of the objectively assessed need for employment land for the District and supports the growth of approximately 800 jobs within the District.
- 5.21 Staffordshire Moorlands District Council is unable to accommodate any potentially arising unmet employment needs from neighbouring authorities due to development

constraints. In particular, the supply of land in the District is limited by Green Belt which should only be released in exceptional circumstances. Furthermore, the District also partly lies within the Peak District National Park

- 5.22 Stafford Borough Council published an Employment Land Review in 2012 as part of the evidence for the Plan for Stafford Borough 2011-2031 which concluded that 160 hectares of employment land is required for the area at 8 hectares per year.
- 5.23 The Plan allocates a total of 89 hectares of new employment land on strategic development areas at Stafford, Stone, Ladfordfields and Raleigh Hall. Currently 23.2 hectares have been completed since 2011 and 70 hectares (gross) have planning commitments, with 50.4 hectares allocated. At this stage no request has been received from neighbouring authorities to accommodate any unmet employment needs within Stafford Borough.
- 5.24 Newcastle-under-Lyme Borough Council and Stoke-on-Trent City Council agreed a Joint Employment Land Review in December 2015 to inform the preparation of a new Joint Local Plan. The ELR together with the SHMA, recommends that the OAN for employment land should be set to meet the Cambridge Econometrics LEFM, amounting to 199 hectares of land to be delivered for B-Class uses over the plan period 2013 to 2033. This OAN is made up of 68 hectares for Newcastle-under-Lyme and 131 hectares for Stoke-on-Trent.
- 5.25 However the availability of land for employment development in the plan area has led the councils to identify a preferred employment land supply of 230 hectares, which is approximately 15% higher than the OAN. Both councils propose to maintain this high level of supply across the plan area so as to help deliver wider economic aspirations and give flexibility and choice for the market.
- Within Newcastle-under-Lyme this supply is made up of the following:
- 4 hectares of completed employment land between 2013 and 2017
 - 28 hectares of vacant land with planning approval
 - 18 hectares of vacant employment land that is currently considered to be suitable and available.
- 5.26 Within Newcastle-under-Lyme there is currently an identified shortfall of 18 hectares of employment land. However in support of the delivery of an innovation led, higher value employment growth, as advocated by the Stoke-on-Trent and Staffordshire LEP, the Joint Local Plan Preferred Options Consultation Document has proposed the development of 12.5 ha of B1a/B1b land within the Green Belt adjacent to the existing Keele Science and Innovation Park. This leaves a shortfall of 5.5 hectares against the identified need of 68 hectares. However, as indicated above this shortfall can be met across the Functional Economic Market Area.
- 5.27 The new jobs that are projected to be created under the OAN total 17,372 jobs. Of this total job growth figure, 7,613 are projected to be in Newcastle-under-Lyme and 9,759 in Stoke-on-Trent. Within Stoke-on-Trent the Joint Local Plan Preferred Options Consultation Document (para. 2.32 – 2.35) identifies a supply of 167 hectares of employment land (against a requirement of 131 hectares) within Stoke-on-Trent, the supply is made up of the following:
- 37 hectares of completed employment land between 2013 and 2017
 - 87 hectares of vacant land with planning approval
 - 43 hectares of vacant employment land that is currently considered to be suitable and available.

- 5.28 In Stoke-on-Trent 69% of the employment land supply comprises of previously developed land and the preferred sites are all identified within the urban area of Stoke-on-Trent and are concentrated close to the City and Town centres and around major transport corridors (that is the A50 and A500 and the Manchester-Stafford and Crewe-Derby railway lines). The Ceramic Valley Enterprise Zone covers a large proportion of this employment land supply, from Cliffe Vale and Etruria Valley in the centre of the conurbation to Chatterley Valley and Tunstall in the north. The updated monitoring evidence identifies that Stoke-on-Trent is experiencing a marked improvement in the take-up of employment land in recent years and this is now at a level that is comparable to longer-term trends. All four authorities will liaise on future consideration and evidence gathering in relation to employment requirements and provision undertaken as part of future plan making.

Co-ordination of shared infrastructure

- 5.29 Signatories to this statement will co-ordinate green infrastructure strategies and any subsequent delivery plans to ensure a consistent and complementary approach
- 5.30 Highways England has identified the need to consider the cumulative impact of development at Blythe Vale along with growth identified in the Joint Stoke-on-Trent and Newcastle Borough Local Plan and East Staffordshire Local Plan on the A50 with a detailed assessment of the impact of the A50/A521 junction a priority.
- 5.31 Staffordshire Moorlands District Council will work with partners, including the signatories to this Statement of Common Ground and others such as Staffordshire County Council, East Staffordshire Borough Council, Highways England, landowners and developers to implement the requirements of Policy DSR1 to ensure that cross boundary strategic planning matters are addressed. This will include consideration of the transport implications for the A50, associated improvements as required by Highways England and the Derby-Crewe railway line and services.
- 5.32 There are cross boundary movements of pupils between the respective authority areas. The signatories to this statement will liaise with one another and Staffordshire County Council to address matters that may arise in terms of accommodating growth and the subsequent demand for school places.

Green Belt

- 5.33 The adopted and proposed Green Belt boundaries in Staffordshire Moorlands prevent urban sprawl and the merging of towns and villages along the border of the Local Plan areas.
- 5.34 The North Staffordshire Green Belt boundary was originally defined in 1967 and its function defined in The North Staffordshire Green Belt Local Plan adopted in 1983 (Summary of Survey and Issues Section, para 1.02) as directing the continuing pressure for development in rural areas to the regeneration of the older parts of the urban areas and maintaining the valuable tracts of open countryside near the built up area.

5.35 At paragraph 2.03, it sets out the established aims of the Green Belt in North Staffordshire, as originally approved by the County Council in 1967. This is as follows:

- a) To limit the expansion into adjoining open country of the urban areas of North Staffordshire forming part of the Potteries Conurbation.
- b) To prevent the following towns and settlements in the adjoining open area from merging with the Potteries Conurbation and with other settlements;
 - a) The built up areas of Kidsgrove (within Newcastle-under-Lyme) and Biddulph;

b) The settlements of:

Brown Edge, Endon, Stanley, Bagnall, Stanley Moor, Norton Green, Baddeley Green, Baddeley Edge, Light Oaks, Werrington, Cellarhead, Caverswall, Cookshill, Blythe Bridge, Forsbrook, Meir Heath, Barlaston (within Stoke-on-Trent)

Alsagers Bank, Halmer End,

Miles Green, Wood Lane, Bignall End and Audley. (within Newcastle-under-Lyme)

c) To prevent the coalescence of the following towns and settlements around the Potteries Conurbation:

Madeley Heath with Madeley;
Betley with Audley. (within Newcastle-under-Lyme)

Leek with Longsdon;
Leek with Cheddleton;
Longsdon with Cheddleton;
Longsdon with Endon;
Cheddleton with Folly Lane;
Folly Lane with Wetley Rocks;
Wetley Rocks with Cellarhead;
Cheddle with Kingsley Holt;
Kingsley with Kingsley Holt;
Cheddle with Dihorne;
Cheddle with Forsbrook;
Fulford with Meir Heath;
Stone with Oulton;
Stone with Yarfield;
Tittensor with Barlaston;
Barlaston with Stone;

5.36 The adopted Plan for Stafford Borough 2011-2031 (June 2014) identifies the Green Belt boundaries for the Borough, located to the north of Stone forming part of the North Staffordshire Green Belt area and south east of Stafford as part of the West Midlands Green Belt area. As there is sufficient land to serve the development needs of Stafford Borough outside of these Green Belt areas no safeguarded land or boundary changes have been identified. However Policy E5 does identify Major Developed Sites in the Green Belt at Hadleigh Park, Moorfields Industrial Estate and

the former Meaford Power Station site where employment uses are supported on previously developed areas. The North Staffordshire Green Belt will be maintained through the New Local Plan in line with the national policy position and the local context.

- 5.37 The authorities will liaise on any future Green Belt reviews that would affect shared the Green Belt boundaries in order to consider the merits of a consistent approach.

Constellation Partnership

- 5.38 All signatories to this statement form part of the Constellation Partnership which is in the process of developing a growth strategy to maximise the economic benefits of the potential HS2 hub at Crewe across Cheshire and Staffordshire.
- 5.39 Joint working between the signatories of this statement and the wider partnership are set out in the terms of the Constellation Partnership Concordat.
- 5.40 Emerging or future Local Plans will have regards to the Constellation Partnership's Growth Strategy.

Blythe Vale Strategic Allocation

- 5.41 The Staffordshire Moorlands Local Plan includes a 48.5ha mixed-use allocation for approximately 300 dwellings, employment and supporting infrastructure at Blythe Vale. The site lies adjacent to the A50 and is in close proximity to the boundary with Stoke-on-Trent and Stafford Borough.¹
- 5.42 Policy DSR1 (Blythe Vale) of the Staffordshire Moorlands Local Plan includes a requirement for the preparation of a comprehensive master plan for the site, the provision of a Transport Assessment, Travel Plan, flood risk assessment, landscaping scheme, ecological survey and management plan, measures to improve sustainable transport routes and connectivity with Blythe Bridge and contributions towards open space, education and other community needs as required.
- 5.43 Stafford Borough Council notes the significant mixed use development at Blythe Vale including 300 new homes and over 48 hectares of employment land, which is supported through the Constellation Partnership provided this notes new development at Hadleigh Park, a Major Developed Site in the Green Belt of Stafford Borough. However the Borough Council wish to be consulted on further detailed studies regarding new infrastructure at Blythe Vale as well as a master plan for the area setting out links to adjoining areas and landscape implications. Whilst the Borough Council welcomes the Blythe Bridge Opportunity corridor for green infrastructure, areas designated for potential new floodplain and riparian woodland within Stafford Borough Council's area should be removed from the Staffordshire Moorlands Local Plan's Green Infrastructure Strategy maps

¹ On 2nd November 2017, full planning consent was granted by Staffordshire Moorlands District Council on part of the allocation for 118 dwellings, access, pedestrian and cycle linkages, open space, landscaping and sustainable urban drainage measures.

- 5.44 The Newcastle-under-Lyme and Stoke-on-Trent Joint Employment Land Review 2015 identified the Blythe Bridge strategic site as playing an important role in meeting the investment needs of the Stoke and Newcastle conurbation in the early 1990s.
- 5.45 Newcastle-under-Lyme Borough Council considers that the proposed employment land allocation at Blythe Vale (southern part of the 'site) should be protected from being developed for housing and promoted for B2/B8 uses.
- 5.46 Stoke-on-Trent City Council considers the Blythe Vale site to be an important strategic employment site on the boundary of Stoke-on-Trent, as recognised within the Newcastle-under-Lyme and Stoke-on-Trent Joint Employment Land Review 2015. The allocation of the Blythe Vale site is supported, particularly for employment generating uses and in particular the southern part of the site should be protected for employment uses (B2/B8).
- 5.47 Policy DSR1 (Blythe Vale) of the Staffordshire Moorland Local Plan Submission Version) states that the "residential development should be located to the north of the site". The development will be subject to a comprehensive masterplan for the whole site, including the delivery of employment land to the south of the A50
- 5.48 Staffordshire Moorlands District Council proposes to introduce a more flexible approach to the site by opening the potential range of employment to all B-use class developments, including B8. This departure from the former approach to the Regional Investment Site is proposed in order to facilitate the delivery of the site which to date has been restricted to B1 and B2 (where appropriate) without success.
- 5.49 Staffordshire Moorlands District Council will work with partners, including the signatories to this Statement of Common Ground to implement the requirements of Policy DSR1 to ensure that cross boundary strategic planning matters are addressed.

6 Decision-making & project management

- 6.1 An officer working group with representatives from each authority shall liaise quarterly to determine and agree the scope for further engagement on strategic planning matters. This will include consideration of the need to involve wider stakeholders, including those named in this Statement of Common Ground.
- 6.2 Details of activities undertaken in relation to this Statement of Common Ground shall be recorded and published in a monitoring report in accordance with the Town and Country Planning (Local Planning)(England) Regulations 2012.
- 6.3 This Statement of Common Ground shall be reviewed in whole or in part as required and as a minimum at the time of a relevant Development Plan update or Development Plan review. Any such review will require Member approval from each respective authority.

7 Limitations

- 7.1 For the avoidance of doubt, this Statement of Common Ground shall not fetter the discretion of the local authorities in the determination of any planning application, or in the exercise of any of its statutory powers and duties, or in its response to

consultations, and is not intended to be legally binding. The terms of the Statement of Common Ground can be dissolved at the written request of either party.

Signed

Staffordshire Moorlands District Council

[Redacted Signature]

Stafford Borough Council

Date

4-6-2018

Stoke-on-Trent City Council

[Redacted Signature]

PORTFOLIO HOLDER
Newcastle-under-Lyme Borough Council

25.6.2018

[Redacted Signature]

Portfolio Holder for
Planning + Growth.

23.5.2018



F.A.O Forward Planning,
Stafford Borough Council,
Civic Centre,
Riverside,
Stafford,
ST16 3AQ

20th April 2020

Dear Sir/Madam,

Issues and Options Consultation, Monday 3rd February – Tuesday 21st April 2020

Instructions: The Leith Planning Group have been instructed by Staffordshire University to review the Issues and Options document, Non-Technical Summary and other associated documents in order to make representations. It is understood the consultation runs from Monday 3rd February to Tuesday 21st April 2020.

Documents: In drafting this submission we have had regard to the following Council documents:

- *Issues and Options – Consultation Document*
- *Issues and Options – Non-Technical Summary*
- *Local Development Scheme (2019)*
- *The Plan for Stafford Borough (2014)*
- *The Plan for Stafford Borough – Part 2 (2014)*
- *Strategic Housing and Employment Land Availability Assessment (2020)*
- *Playing Pitch Strategy (2019)*
- *Authority Monitoring Report (2019)*
- *Housing Monitor for New Homes (2019)*
- *5 Year Housing Land Supply Statement (2019)*

Context: As detailed within Paragraph 1.1 of the Issues and Options document, the current Local Plan comprises of the Plan for Stafford Borough (2014) and Part 2 of the Plan for Stafford Borough (2017), both produced by Stafford Borough Council. The current Local Plan also includes the Minerals Local Plan for Staffordshire (2017) and the Staffordshire and Stoke-on-Trent Waste Local Plan (2013), both produced by Staffordshire County Council. These documents set out proposals for the use of land and policies to guide further development in order to help deliver sustainable growth in Stafford for the period up to 2031.

As set out in Section 3 of the Local Development Scheme (2019), the new Local Plan 2020-2040 will fully replace the currently adopted Plan for Stafford Borough, including Part 2 of the Plan.

Paragraph 33 of the National Planning Policy Framework details;

“Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary¹⁸. Reviews should be completed no later than five years from the adoption date of a plan and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future.”

The sections within the Issues and Options document detail the progress to date in the Local Plan Review and describe in detail the issues facing Stafford Borough and the potential options available. The document also poses a number of questions to the audience for answer within this consultation and, as set out within the non-technical Summary, it advises that you are,

“seeking views on the planning issues the Borough faces, including where new homes, jobs and other facilities should be located. This consultation is one of the steps towards putting in place the Council ’ s New Local Plan.”

Response:

The Leith Planning Group have been instructed by Staffordshire University to review the Issues and Options document, Non-Technical Summary and other associated documents in order to make representations. We have chosen to provide answers to some of the questions that are considered more relevant to our clients site and these are set out below for your review.

Question 3.A: Do you agree that the Vision should change?

We agree that the current vision for the Local Plan period is too extensive and should be shortened and focussed on the aspects the new plan will seek to deliver over the period 2020-2040. We do however consider the following objective should be retained within the new vision:

“By 2031 Stafford Borough will have:

d. reduced the need to travel, through the provision of increased services and facilities in key locations to sustain the surrounding rural area”

There are still a number of rural villages within the Borough that lack adequate facilities, meaning their residents are likely to have to rely on travel by car to access amenities such as shops and schools. Some of the Borough’s rural villages also lack public transport and therefore it is considered the above objective has not yet been achieved and should be retained within the new vision for the Borough.

As the larger settlements such as Stone and Stafford continue to expand, the smaller villages within the Borough should also be allowed to expand to a point to ensure their longevity and sustainability.

Question 3.B: Do you agree that the Vision should be shorter?

For the reasons set out above, yes.

Question 5.D(i): Do you agree with the basis for the preparation of the 2019 Settlement Hierarchy?

We agree with the basis and approach taken by the Council for the preparation of the 2019 Settlement Hierarchy.

Question 5.D(ii): Do you agree that the smaller settlements should be included in the Settlement Hierarchy?

We support the inclusion of smaller settlements within the settlement hierarchy and their limited growth. We consider that it is essential to allow a level of housing and other development growth within the smaller settlements and rural areas to ensure that they can grow organically, do not become stagnate and to support the limited amenities within these settlements. If the smaller settlements are not permitted to expand, by virtue of additional residential dwellings or through new amenities or commercial opportunities, there is a risk that these settlements become stagnant communities. Current, and future, residents may also choose to move away due to a lack of suitable accommodation or 'Affordable Housing', or there being no key local amenities being provided.

Question 5.F(a) In respect of these potential spatial scenarios do you consider that all reasonable options have been proposed? If not, what alternatives would you suggest?

We consider all reasonable and potential spatial scenarios have been proposed within the document.

Question 5.F(b): Are there any of these spatial scenarios that you feel we should avoid? If so, why?

We feel that "Intensification of Town and District Centres" should be avoided. This is due to the level of development the Town and District Centres have experienced over the current plans period. Over-intensification of development within these areas could lead to increased pressure on services, such as public transport, and may result in stagnated rural communities and villages. As such, we consider all areas of the Borough should be given the opportunity to benefit from new developments.

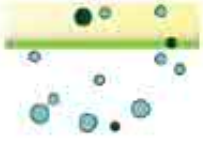
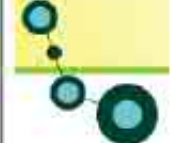
Question 5.F(c): Which of these spatial scenarios (or a combination) do you consider is the best option? Please explain your answer

We consider that the "Dispersal of Development" and the "String" Settlement/Settlement Cluster" scenarios would support the most sustainable growth of the Borough.

The Dispersal of Development approach would ensure that all settlements are afforded a degree of growth to support their communities, amenities and longevity. It would ensure that smaller settlements in particular can combat the challenges of their changing demography. In addition to this, the Dispersal of Development scenario would allow for proportionate development across the Borough. This is particularly important given the extensive extension of particular settlements, such as Stone, in recent years. We consider that this is the most appropriate option for Stafford Borough Council to move forward.

The "String Settlement" scenario would also support the rural areas of the Borough, particularly those that currently have a small number of amenities or limited public transport links. By allowing a number of smaller settlements to be collectively served by infrastructure, we consider that the challenges of the changing demographic and sustainability of the settlements will be improved. We consider that this is second most appropriate option for

Stafford Borough Council, and that if this could be added to the 'Dispersal of Development' approach this would provide the greatest support to growth across the Borough.

 <p>Dispersal of development</p> <p>This would involve spreading new development across the Borough including in smaller settlements</p>	<ul style="list-style-type: none"> • Smaller sites unlikely to generate infrastructure needs alone so are unlikely to significantly contribute to improvements in infrastructure • The character of smaller settlements might be adversely affected by new development • Expanding some smaller settlements can support local shops, pubs, bus services etc • Smaller sites can improve deliverability rates 	 <p>"String" settlement / settlement cluster</p> <p>Where development is focussed on a number of linked settlements. It could involve new and/or existing and/or expanded settlements</p>	<ul style="list-style-type: none"> • Need to be close to existing high-quality transport corridors • Relies on there being suitable broad locations available for this type of development • May involve promoting development at some existing, small settlements which may significantly alter their character • A number of smaller settlements could collectively be of sufficient scale to be served by shared infrastructure
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As detailed at paragraph 5.40 of the Issues and Options document, under the current adopted plan, new housing development in Key Service Villages has been disproportionate and some villages not identified as a Key Service Village but have a number of services and facilities are unable to grow. A combined approach of the two scenarios above would allow growth of the smaller settlements benefitting from services and facilities and also better connect these settlements to the wider smaller settlements with limited services and facilities. This would also have sustainability benefits by reducing the distance and/or need to travel by car to reach services and facilities.

Question 5.H(i): Do you agree that the only NPPF-compliant Growth Options proposed by this document are No. 3 (Disperse development across the new settlement hierarchy) and No. 5 (Disperse development across the new settlement hierarchy and also at the Garden Community / Major Urban Extension) and No.6 (Concentrate development within existing transport corridors)?

We agree that the above three options are the only NPPF-compliant Growth Options proposed within the Issues and Options document and would therefore request that these options are explored further.

Paragraph 78 of the National Planning Policy Framework reads as follows:

"To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby"

As Growth Option 3 is considered compliant with the NPPF, we would ask that the Council consider the Borough-wide benefit of *Growth Option 3: Disperse development across the new settlement hierarchy* as this supports proportionate growth of settlements across the borough. As some areas of the Borough have experienced disproportionate growth during the current plan period (as demonstrated in Table 5.3 of the Issues and Options Document), Option 3 would help in rebalancing residential developments across the Borough to avoid an imbalance of population. By not allowing development in smaller settlements, the Borough runs the risk of stagnant communities which are unable to grow and sustain themselves.

Question 5.J: What combination of the four factors:

- 1. Growth Option Scenario (A, D, E, F, G);**
- 2. Partial Catch Up**
- 3. Discount/No Discount**
- 4. No Garden Community/Garden Community**

Should Stafford Borough Council put forward as its Preferred Option at the next stage of this Plan-Making process?

Please explain your answer.

We consider Scenario A, with a partial catch up, should be put forward as its preferred option at the next stage of this plan making process. We also consider that no discount should be applied as 50% of the 6000 dwellings detailed at Paragraph 5.11 of the Issues and Options Document are uncommitted. As detailed at Paragraph 5.12:

“a) in applying such discount the Authority has to be absolutely confident that all of these dwellings will be delivered (i.e. built out) within the timeframe of the current Plan (i.e. by the end of March 2031) otherwise a shortfall of delivery will occur”

In our opinion, there cannot be absolute confidence that all 6000 dwellings will be built out by 2031 without a significant increase in commitments otherwise this could result in a significant shortfall of required housing completions during the new plans period. We consider that no Garden Community should be proposed as there are a number of existing smaller settlements and rural communities that should be afforded growth. The implementation of a Garden Community approach could mean these settlements lose out on development opportunities which could result in them becoming stagnate or less sustainable,

Question 5.O: Are there any additional sites over and above those considered by the SHELAA that should be considered for development?

We consider our clients site at Land off Newcastle Road, Cotes Heath, Stafford, ST21 should be considered for residential development. We intend to submit the site via the “Call for Sites” pro-forma with these representations.

Question 5.Q: Do you agree with the methodology used to define settlement boundaries? If not, please provide reasons for your response.

We agree with the methodology used.

Question 8.G: Do you consider the lack of smaller housing units to be an issue within the Borough of Stafford? If so, are there any areas where this is a particular problem?

We consider there is a lack of smaller housing units within the Borough of Stafford. This has been exacerbated by the disproportionate development of some settlements, as detailed within Table 5.3 of the Issues and Options Document. In addition, and as detailed at Paragraph 8.19, there is an imbalance in the housing mix between urban and rural housing stocks of an

area. As such we feel the emerging Local Plan should seek to address the issue of a lack of smaller housing units and the imbalance in the current housing stock.

Question 8.K(a): Do you consider an affordable housing provision of between 252 and 389 units per annum to be achievable?

We consider an affordable housing provision of between 252 and 389 units per annum is an achievable figure for the Borough, albeit the higher figure should be sought. The Local Authorities Monitoring Report (2019) found that the average delivery of new affordable housing over the last three year is 236 per annum, above the Plan target of 210. We consider that if a greater target is promoted, the number of affordable completions in the area would increase thereby ensuring the target is met. At present, based on the current average delivery, we do not consider the current target will be met

Our client currently has two Permission in Principle applications awaiting determination, each for 9 x 100% affordable dwellings, with further land that could be available in the future for similar developments. A Housing Needs Assessment submitted in support of the application identified a need for at least 15 affordable units in the Parish of Standon alone.

Question 12.A: Do you agree with the approach to delivering sustainable transport for Stafford Borough through the new Local Plan? If not, please give a reason for your response.

We generally agree with the approach to delivering sustainable transport for the Borough through the new Local Plan. However, we would request greater emphasis is placed on increasing access to sustainable transport, particularly a greater number of public transport links, within the Borough's smaller settlements. This will improve the sustainability of the settlements and provide greater opportunity for their sustainable expansion.

Land off Newcastle Road, Cotes Heath, Stafford

With direct reference to our client's site, we consider that allowance should be made for the proportionate growth of smaller settlements within the Borough for the reasons outlined in these Representations. This is needed to ensure communities and housing stock do not become stagnate and to provide and promote ongoing support to the services and facilities presently in these areas. Our client's site is located off Newcastle Road, Cotes Heath. One issue identified with rural villages, such as Cotes Heath, is it's blanket allocation within the Green Belt. We consider limited development within, and at the edge of, existing settlements will be essential during the proposed plan period of 2020-2040. In addition, Paragraph 145 of the NPPF details:

"A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:

- a) buildings for agriculture and forestry;*
- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;*
- c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;*
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;*
- e) limited infilling in villages;*

*f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:*

- not have a greater impact on the openness of the Green Belt than the existing development; or*
- not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.”*

We therefore consider that limited proportionate development within rural settlements, such as Cotes Heath, would also be compliant with the National Planning Policy Framework, and that this should be promoted within the emerging documents.

In addition, we consider further investment in public transport, particularly in rural areas will increase the connectivity of the smaller settlements and support the services and facilities in these areas of the Borough.

Please confirm receipt of these representations and ensure we are notified of all future progress and consultations in relation to the Local Plan review using the contact details below.

Yours sincerely,

Abigayle Boardman
BA(Hons)
Planning Technician

[Redacted signature block]

**New Stafford Borough Local Plan 2020-2040
 “Issues and Options” Consultation - Response Form**

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent’s Details (if applicable)
Title		Mr
First Name		Stephen
Surname		Stoney
E-mail address		
Job title (if applicable)		Technical Director
Organisation (if applicable)	Baden Hall Estate	Wardell Armstrong LLP
Address		
Postcode		
Telephone Number		

Thank you for taking the time to provide your comments on the “Issues and Options” document for the Stafford Borough Local Plan 2020-2040. All comments will be considered when preparing the Preferred Options for the New Local Plan.

Please return this form either by email (preferred) to: forwardplanning@staffordbc.gov.uk

or by post to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ

Please ensure receipt by Stafford Borough Council **by 12.00 noon Tuesday 31 March 2020.**

For advice on how to respond to the consultation and how to fill in this form, please see the Consultation Guidance Notes on the Council’s website at: www.staffordbc.gov.uk/new-local-plan or call 07800 619636 / 07800 619650.

Please note:

- Comments must be received by 12noon on Tuesday 31 March 2020. Late comments will be considered “not duly made” under the Regulations;
- Please fill in a separate Part B for each question/paragraph/table/topic you are commenting on and, where necessary, please explain your response;

- Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name		Organisation			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	See below	Paragraph	See below	Table	-
Figure	-	Question	See below	Other	-
2. Please set out your comments below					
Section 2 – 2.16 Section 5 – Q 5 F Q 5 G Q 5 H Q 5 I Q 5 J Q 5 N 5.8 and 5.33 to 5.78 Section 8 - 8.5 to 8.7 Q 8 A See below for comments.					
1 INTRODUCTION					
<p>Baden Hall Estate is fully owned and controlled by JT & DC Goucher and is an operating farm with associated leisure pursuits, at Coldmeece.</p> <p>An annotated is attached illustrating land ownership (reference ST13585-007 rev A).</p> <p>This submission provides a response to and representations in respect of the Stafford Borough Local Plan Issues and Options (I&O) consultation 2020 -2040.</p> <p>This submission focuses on our perceptions of the key planning considerations for the Stafford Local Plan Review in order to enable its soundness and successful implementation.</p> <p>A complimentary representation has been submitted by Dean Lewis Estates who have a contractual relationship in the planned delivery of development on Area 1 of the overall Estate.</p> <p>Personal statement</p> <p><i>“As the owners of the Baden Hall Estate, an integral part of the proposed Meecebrook Garden Village, we are fully committed to delivery in the context of the new Local Plan. We are willing to commit the land under our control, with that under contract to Dean Lewis Estates, to the creation of a Garden Community working with</i></p>					

other landowners and development partners.

The Estate itself offers a diverse environment, including redundant former MOD firing ranges, a farmstead, recreational facilities including playing fields and open water and substantial green infrastructure.

We look forward positively to the new Local Plan embracing the Meecebrook Garden Village at its heart, optimising the locational advantages of the existing employment corridor and HS2 growth potential to create a sustainable modern and well-designed place which should be attractive to the community, and importantly safeguards the intrinsic character of the rest of the Borough.”

The Estate is represented on the Meecebrook Programme Board. The appropriate background is as follows:

In March 2019 the Council was awarded £750,000 by the HMCLG to support initial feasibility studies and programme management for the proposals of a new Garden Community in Stafford Borough. At its meeting on the 5th September 2019 Cabinet agreed to spend the grant funding in consultation with the Meecebrook Programme Board. The Meecebrook Programme Board held its first meeting in July 2019 and has continued to meet into 2020 within the parameter of the agreed Terms of Reference. Delivery of the Meecebrook is also supported through an approved governance structure that includes Programme Delivery Team and Thematic Working Groups. During 2019/20 the grant funding supported feasibility studies relating to transport and master-planning (visioning), the appointment of a programme manager and support across a range of elements has been secured through the commissioning of technical experts.

The fact that the Government have backed the above through its initial stages of feasibility and national assessment process, over and above any other Plan option site, is a material consideration.

2 SPATIAL PORTRAIT

New Garden Settlement

The I&O confirms that Stafford Borough is considering a variety of visionary and far reaching proposals for the development of a new garden settlement. The

assessment of the Strategic Development Site Options for potential locations has been undertaken. This would have the potential to provide a huge economic boost to the Borough including unlocking surplus brownfield land whilst creating a modern and sustainable living and working environment, taking significant development pressure off existing settlements, in particular key service villages that are in danger of losing their inherent character and well-being. There is a demonstrable area of land in the north-west of the Borough – named in the Plan as Meecebrook at Coldmeece – and other possible locations which have the potential for thousands of new homes and employment opportunities. Such a scale of development would also include local shops, community facilities such as schools and medical services, and potentially new transport infrastructure. **Baden Hall Estate strongly support this spatial policy approach.**

The Proposals for a New Garden Settlement at Meecebrook avoids adverse impacts on important environmental designations, spatial policy designations and identified heritage assets. Avoidance of adverse impacts upon these designations is a key objective of the NPPF. In terms of environmental sustainability, a New Garden Settlement, in its proposed location at **Meecebrook**, is demonstrably capable of delivering growth without giving rise to unacceptable adverse impacts. **Baden Hall Estate consider that, in contrast to other spatial location options within the borough, it should be regarded as being the preferable location, not least due to its connectivity within a spatial pattern of HS2 opportunity driven growth.**

3 THE DEVELOPMENT STRATEGY

Baden Hall Estate support the ‘Scenario E Jobs Growth – Policy on’ as this also has regard to regeneration and the growth projected to occur at a potential New Garden Community / Settlement and HS2 driven growth, projecting the creation of around 12,500 new jobs. The increased number of homes above the base levels is justified by a justified case for an innovative ‘Growth Plan’.

In the context of **Potential Growth options – Question 5.F – the Garden Communities option is favoured** in that it allows the delivery of properly planned physical, social and environmental infrastructure as opposed to incremental sporadic growth that shows lesser respect to its spatial characteristics.

The spatial alternatives being assessed are:

i.	Land north and east of Gnosall. This area of land could accommodate up to 3,500 new homes and supporting employment.
ii.	Land between Gnosall and Haughton north of the A518 between Stafford and Newport. This area of land could accommodate up to 3,250 new homes and supporting employment.
iii.	Seighford , a largely agricultural site with an airfield and established employment land either side of the B5405 to the west of Stafford town. This area of land could accommodate up to 5,250 new homes and supporting employment.
iv.	Land to the north of Redhill Business Park and to the west of the A34 near to M6 Jn14 Stafford North. A large tract of land that could accommodate up to 5,000 new homes and supporting employment land.
v.	Meecebrook , focussed around Cold Meece south of Swynnerton. This has the potential for up to 11,500 new homes and supporting employment land.
vi.	Hixon. An ex-WW2 airfield located to the east of the Borough. Much of the site is currently unused and is partly developed as an industrial park. The site on the edge of Hixon could be expanded to accommodate up to 2,750 new dwellings and supporting employment land.
vii.	Land East of Weston. There are a number of environmental constraints in this area but there is potential to bring forward up to 2,000 new homes and supporting employment land.

The Baden Hall Estate response is that the principle of a Garden Community is essential to the successful delivery of the new homes and employment space needed to the properly underpin a Growth Strategy for Stafford Borough up to 2040. When considering the constraints manifest within the borough in terms of physical constraints, environmental and policy constraints, it is evident that the incremental growth based around the existing settlement hierarchy or an adjusted settlement hierarchy as would not be capable of underpinning a sound growth strategy in a sustainable manner. The most appropriate form of Garden Community proposal as assessed by AECOM in the Strategic Development Sites Options evidence base is considered below.

Option v. The Meecebrook Garden Settlement is demonstrably the most sustainable option. The AECOM assessment at 5. Conclusions (Pages 56, 57 and 58) states at 5.8 that D Meecebrook (and E Hixon) are potentially most suitable... as they benefit from high potential for sustainable access. This assessment at Table 13 (Page 58) is within the context of NPPF criteria, and in the context of Meecebrook picks up on the established employment corridor in the area providing a strong basis for future sustainable development principles of attractive and convenient places to live and work. The committed IMD adjacent to the nearby village of Yarnfield and the potential for a rail halt on the existing WCML are

commensurate positive effects of HS2 driven growth in a spatially preferable location.

Meecebrook has the ability to deliver a comprehensive range of essential community facilities that are required to support a new community. Its scale and natural characteristics of relative self-containment around a core of ex- MOD planned environs with an established employment corridor and close-by natural environment including green corridors and water space lend it ideally to the creation of a Garden Settlement.

Potential Growth Options

Growth Option 1: Stafford and Stone only focussed development. This would be characterised by the scenarios "Intensification of Town and District Centres"; and "Intensification around the edges of larger settlements and strategic extensions" described above.

Growth Option 2: Stafford, Stone & Key Service Village focussed development (business as usual – reflecting the approach in the adopted Plan for Stafford Borough). This would be characterised by a combination of the scenarios "Intensification of Town and District Centres"; "Intensification of edges of larger settlements and strategic extensions"; and "Wheel" described above.

Growth Option 3: Disperse development across the new settlement hierarchy. This would be characterised by a combination of the scenarios "Intensification of Town and District Centres"; "Intensification of edges of larger settlements and strategic extensions"; and "Dispersal of development" described above.

Growth Option 4: Focus all new development at new Garden Communities only. This would be characterised by the scenario "Garden Communities" described above.

Growth Option 5: Disperse development across the new settlement hierarchy and also at the new Garden Community / settlement. This would be characterised by a combination of the scenarios "Intensification of Town and District Centres"; "Intensification of edges of larger settlements and strategic extensions"; "Garden Communities"; and "Dispersal of development" described above.

Growth Option 6: Allocate development to settlements linked by existing transport corridors. This would be characterised by a combination of the scenarios "Intensification of Town and District Centres"; "Intensification of edges of larger settlements and strategic extensions"; and "String" described above.

Option 5 seeks to disperse development across the new settlement hierarchy and also at the new Garden Community / settlement. It would blend the allocation of development across all the settlements identified in the new Settlement Assessment (having due regard to identified constraints) as well as at the new Garden Community / settlement. Notably, Meecebrook is the only Garden Settlement

proposal that is autonomous in terms of its delivery, unlike the other six remaining Garden Settlement options that are either co-dependent related growth locations or are simply urban extensions. In either of the latter scenarios development of any scale is reliant on significant off-site infrastructure. Meecebrook has the capability to deliver its own infrastructure all within the confines of one single strategic site.

Baden Hall Estate support the council's approach with regard to this option – Option 5 in so far as it would be necessary to ensure that sufficient land is allocated within the Settlement Hierarchy until delivery at the new Garden Community commences. At which point the balance of delivery would predominantly shift to the new Garden Community. The Council has taken a highly cautious view that delivery of the Garden Community would not commence until 2030. Whilst it is acknowledged that lead in time for such large projects can be significant, we consider that the delivery of the first phases of development could occur by 2025/2026 within a phasing strategy that would not undermine comprehensive delivery over a planned trajectory.

It is agreed that only Options 3, 5 and 6 are NPPF policy compliant, and of these Option 5 is the most sustainable.

Baden Hall Estate support delivery at the Meecebrook Garden Community as soon as practical, with land on policy unconstrained distinct brownfield land parcels, in order to:

- Achieve modern patterns of sustainable growth
- Take pressure off existing settlements in the settlement hierarch as soon as practical (Question 5.1)
- Build on an established economic corridor
- Optimise a strong environment for uplift of public enjoyment and biodiversity enhancement

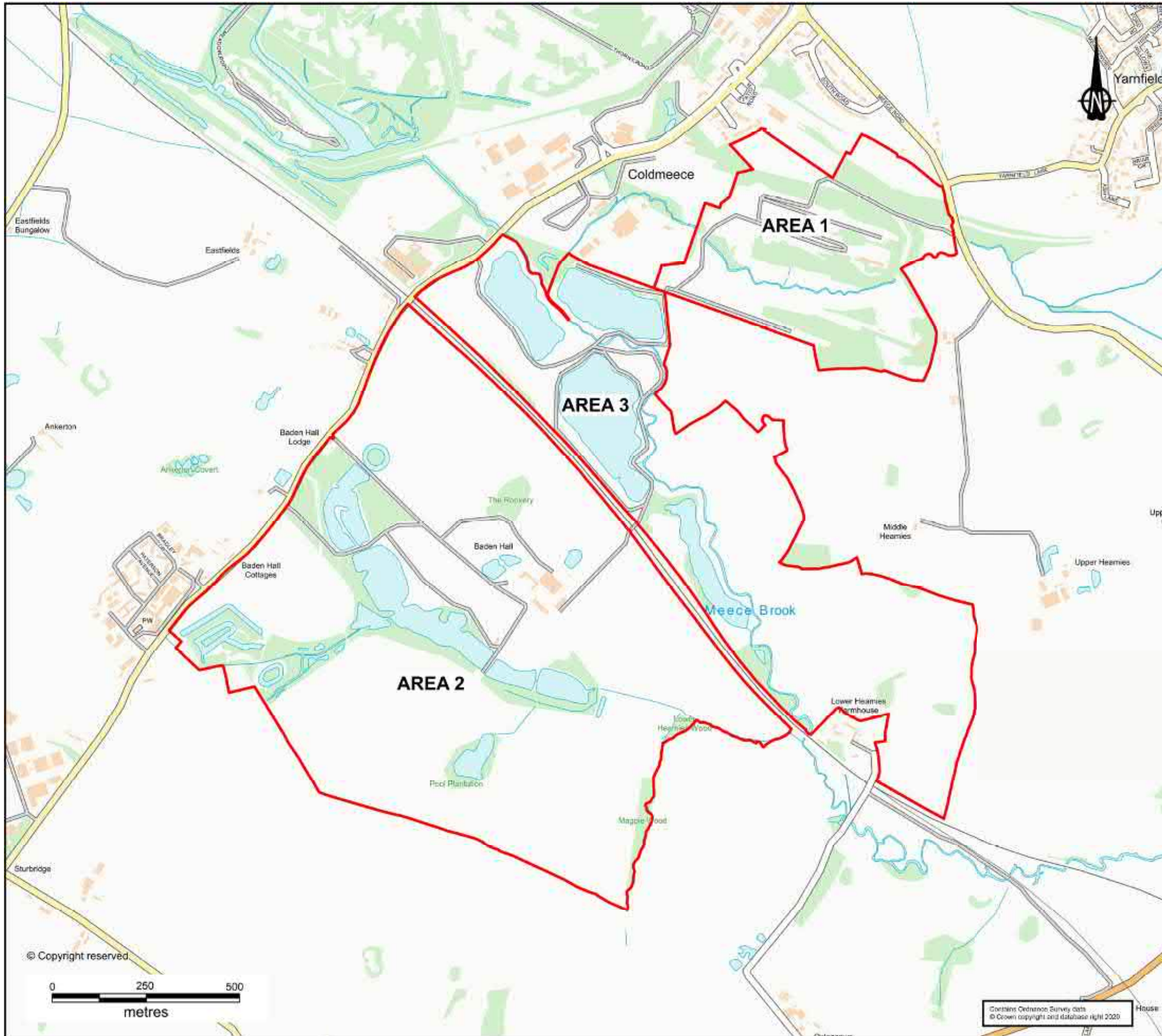
It is clear that any reasonable Growth Strategy will require a significant contribution from a Garden Community (confirmed by the EDHNA), and in the interests of soundness it is preferable that this be back-loaded in timescale only to a degree that is fully justified.

The Baden Hall Estate response is that the most logical development Growth Option that will deliver the most sustainable outcome and will ensure the most robust form of delivery of housing and employment generation required to meet the

needs of the borough is a **hybrid of growth Options 5 and 6**. This will also enable a significant promotion of the under delivery of new homes to be caught up on. Integral to the successful delivery of the whole plan in this regard is the delivery of a new Garden Community at Meecebrook.

In the context of Question 8A - the appropriate the use of brownfield land for development means that the pressure placed on greenfield land is reduced, preserving wherever possible the natural character of an area. An approach which actively prioritises the development in this manner is supported, in that the Baden Hall Estate has such distinct unused areas that can be brought forward without impediment.

Please use a continuation sheet if necessary



KEY
 Area Available for Development

A	Area 3 amended	17/03/20	1	100	100
REVISION	DATE	BY	CHKD	APPD	APPD
CLIENT Baden Hall Estate (Area 2 & 3) and Dean Lewis Estates (Area 1)					
PROJECT Stafford Borough Local Plan					
DRAWING TITLE Meecebrook Garden Settlement Land Promotion					
DRAWING NO	SCALE	DATE			
ST13585-007	1:10 000 @ A3	March 2020			
DRAWN BY	CHECKED BY	APPROVED BY			
MJH	SMS	SMS			
<input type="checkbox"/> STAKEOUT	<input type="checkbox"/> REVISION	<input type="checkbox"/> DATE	<input type="checkbox"/> BY	<input type="checkbox"/> APPD	<input type="checkbox"/> DATE
<input type="checkbox"/> PROPOSED	<input type="checkbox"/> REVISION	<input type="checkbox"/> DATE	<input type="checkbox"/> BY	<input type="checkbox"/> APPD	<input type="checkbox"/> DATE
<input type="checkbox"/> NOT PROPOSED	<input type="checkbox"/> REVISION	<input type="checkbox"/> DATE	<input type="checkbox"/> BY	<input type="checkbox"/> APPD	<input type="checkbox"/> DATE
<input type="checkbox"/> OTHER	<input type="checkbox"/> REVISION	<input type="checkbox"/> DATE	<input type="checkbox"/> BY	<input type="checkbox"/> APPD	<input type="checkbox"/> DATE

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wardell
 armstrong

All comments should be made in writing preferably using this form and should be received by Stafford Borough Council **no later than 12 noon Tuesday 31 March 2020**.

You can view the documents online at www.staffordbc.gov.uk/new-local-plan-

Please e-mail your comments (Preferred) to: forwardplanning@staffordbc.gov.uk

or post your comments to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ.

Thank you for taking the time to contribute to this consultation.

NEW LOCAL PLAN 2020-2040: ISSUES & OPTIONS
STAFFORD BOROUGH COUNCIL – PRIVACY NOTICE

How we will use your details

All representations received to the Stafford Borough New Local Plan 2020-2040 Issues & Options consultation document will be included in a schedule and made publicly available once the consultation has closed.

Stafford Borough Council will consider all representations received, using them to inform the next stage of the process for the New Local Plan 2020-2040.

Comments cannot be treated as confidential. Your personal information, such as your postal and email address will not be published and signatures will be redacted, but your name and organisation will be made available. We will only use your personal information to send you information on the New Local Plan and associated planning policy matters.

We believe you should always know what data we collect from you and how we use it, and that you should have meaningful control over both. As part of our ongoing commitment to transparency, and in relation to the new General Data Protection Regulations (May 2018), we have updated our Privacy Policy.

Stafford Borough Council are the data controller and you can find information about how we handle your personal data by visiting www.staffordbc.gov.uk/privacynotices and if you have any queries or would like to unsubscribe from receiving information then please contact forwardplanningconsultations@staffordbc.gov.uk

Stafford Borough Local Plan 2020-2040 Issues and Options Consultation Document

Representations by **Aspbury Planning Limited** (Agent) on behalf of the **Trent Vision Trust** (Representor)

These Representations are concerned with **Section 5 – Development Strategy** of the I&OCD and specifically Questions 5.B to 5J

- Q5.B (a):** Option E should be seen as the absolute baseline housing requirement, since provision should be not less than the existing LP requirement of 500 dpa, but in view of the economic potential of the area and the economic aspirations of the Plan, together with the continuing housing shortfall, particularly in affordable housing, one of options F, or G + PCU should be adopted, according to the evidenced adoption of a realistic job growth target.
- Q5.B (b):** Yes, a PCU rate **should** be applied to compensate for previous shortfalls.
- Q5.C:** If a discount is applied it should be calculated and applied only against housing actually **delivered** through the rest of the current Plan Period. Allocations and even commitments are not always implemented, so the discount should reflect actual delivery and be a dynamic one that can be adjusted at quinquennial plan reviews. If in the event there is 'over-provision' against the existing Plan requirements no harm arises if the development is sustainable.
- Q5.D (i):** Yes.
- (ii)** Yes, but any development in the small settlements should be treated as 'windfalls' and not counted against any planned provision in the two largest settlements at the top of the hierarchy – Stafford and Stone – which are demonstrably the most sustainable locations. The primacy of the two towns as the focus of most development should not be eroded.
- Q5.E** The Representor has no view on this Issue.
- Q5.F (a)** Yes.
- (b)** Yes: 'Dispersal of Development', 'Wheel Settlement Cluster' and 'String Settlements'. None of these are truly sustainable and the latter is largely a theoretical concept that is unlikely to be practicable because of the reliance on the need to significantly improve and sustain public transport corridors in the long term. Garden Towns and Villages are a seductive and fashionable concept, but require extensive new infrastructure and take a long time to deliver and to reach critical mass in terms of sustainability.
- (c)** 'Intensification of Town and District Centres' and 'Intensification around the Edges of Larger Settlements, because these are clearly the most sustainable options.

- Q5.G The Representor considers that Garden Communities are a distraction from the proper focus of growth on the two largest settlements in the Borough and should not be considered.
- Q5.H (i) No. Those Options are clearly not NPPF compliant and are unlikely to be effectively delivered over the Plan Period. Options 1 and 2 are clearly the most sustainable and deliverable options. Careful selection of urban extensions sites around Stafford and Stone based on comprehensive environmental impact/constraints-based assessments, including the testing through site-specific appraisal of some of the current blanket environmental protection designations and the incorporation of positive environmental mitigation will overcome perceived constraints.
- (ii) See answer to (i) above.
- (iii) No.
- Q5.I No. The use of the characterisation 'development pressure' in the context of sustainable settlements like Stafford and Stone is a subjective judgement. These towns have the capacity to absorb additional growth, which, furthermore, is needed to sustain their Town Centres which are under threat from a number of economic pressures.
- Q5.J For reasons given above, Growth Options F or G plus PCU, preferably no discount, or delivery-related dynamic discount based on quinquennial reviews and no Garden Community.

Aspbury Planning Limited

[REDACTED]

**New Stafford Borough Local Plan 2020-2040
 “Issues and Options” Consultation - Response Form**

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent’s Details (if applicable)
Title		Mr
First Name		Nick
Surname		Hardy
E-mail address		
Job title (if applicable)		Principal
Organisation (if applicable)	St Philips	Avison Young
Address		
Postcode		
Telephone Number		

Thank you for taking the time to provide your comments on the “Issues and Options” document for the Stafford Borough Local Plan 2020-2040. All comments will be considered when preparing the Preferred Options for the New Local Plan.

Please return this form either by email (preferred) to: forwardplanning@staffordbc.gov.uk

or by post to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ

Please ensure receipt by Stafford Borough Council **by 12.00 noon Tuesday 31 March 2020.**

For advice on how to respond to the consultation and how to fill in this form, please see the Consultation Guidance Notes on the Council’s website at: www.staffordbc.gov.uk/new-local-plan or call 07800 619636 / 07800 619650.

Please note:

- Comments must be received by 12noon on Tuesday 31 March 2020. Late comments will be considered “not duly made” under the Regulations;

- Please fill in a separate Part B for each question/paragraph/table/topic you are commenting on and, where necessary, please explain your response;
- Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name Nick Hardy		Organisation Avison Young (for St Philips)			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	Multiple	Paragraph	Multiple	Table	-
Figure	-	Question	Multiple	Other	-
2. Please set out your comments below					
Please see the attached written submission and accompanying Vision Document					

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question		Other	
2. Please set out your comments below					

Please use a continuation sheet if necessary

All comments should be made in writing preferably using this form and should be received by Stafford Borough Council **no later than 12 noon Tuesday 31 March 2020**.

You can view the documents online at www.staffordbc.gov.uk/new-local-plan-

Please e-mail your comments (Preferred) to: forwardplanning@staffordbc.gov.uk

or post your comments to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ

Thank you for taking the time to contribute to this consultation.

NEW LOCAL PLAN 2020-2040: ISSUES & OPTIONS
STAFFORD BOROUGH COUNCIL – PRIVACY NOTICE

How we will use your details

All representations received to the Stafford Borough New Local Plan 2020-2040 Issues & Options consultation document will be included in a schedule and made publicly available once the consultation has closed.

Stafford Borough Council will consider all representations received, using them to inform the next stage of the process for the New Local Plan 2020-2040.

Comments cannot be treated as confidential. Your personal information, such as your postal and email address will not be published and signatures will be redacted, but your name and organisation will be made available. We will only use your personal information to send you information on the New Local Plan and associated planning policy matters.

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New Stafford Borough Local Plan 2020 – 2040: Issues and Options Consultation

Representations made on behalf of St Philips

Land off Castle Street, Eccleshall

April 2020

Contents

1.	Introduction.....	1
2.	Response to Questions.....	2
3.	Land off Castle Street, Eccleshall.....	22

Appendices

Appendix 1	-	Vision Document
Appendix 2	-	St Philips' Representations to the Settlement Assessment (July 2018)

Prepared By: Nick Hardy, Principal

Status: FINAL

Date: April 2020

For and on behalf of Avison Young (UK) Limited

1. Introduction

- 1.1 These representations have been prepared by Avison Young on behalf of our clients, St Philips, in relation to Stafford Borough Council's New Local Plan 2020 – 2040 Issues & Options Consultation Document (February 2020). We refer to the consultation document as 'the Issues & Options' in the remainder of these representations. The consultation sets out to consider the range of development and related issues facing Stafford Borough and how, through a new strategic policy framework, they might be addressed. The consultation includes matters such as the level of housing and employment land which will be required for development over the next 20 years, and how these might be distributed across the Borough.
- 1.2 St Philips have interest in land east of Castle Street, Eccleshall ('the Site') which is edged red on the Site Boundary Plan in the supporting Vision Document which is submitted in conjunction with and to support these representations. St Philips also has an interest in the land to the immediate south of the Site, which lies within the Settlement Boundary of Eccleshall that is established in the Plan for Stafford Borough Part 2 and the Eccleshall Neighbourhood Plan (ENP). As a consequence, the land to the south (which we refer to as the Phase 1 land) comprises a suitable and preferred location for residential development.
- 1.3 The Phase 1 land is capable of development in isolation. The Site which is promoted in these representations comprises a logical extension to the Phase 1 land. The combined Site would deliver comprehensive and beneficial development that would contribute towards meeting Local Housing Need and would deliver recreation opportunities that are promoted in the ENP. We summarise the merits of the Site later in these representations by reference to the content of the accompanying Vision Document.
- 1.4 The current Local Plan covers the period 2011-2031 and seeks to manage the amount and location of new development and infrastructure such as housing, shops and green spaces. The Plan contains a vision, spatial principles and specific policies, whilst Part 2 of the Plan details Settlement and Recognised Industrial Estate boundaries, together with a policy protecting community / social facilities.
- 1.5 The new Local Plan once adopted will replace the Part 1 and Part 2 Plans for Stafford Borough. Stafford Borough Council initiated its Local Plan Review in July 2017, with a 'Call for Sites' consultation for new development, including land to be placed on the Brownfield Land Register. St Philips submitted the Site for consideration as part of this process and as a logical extension to the Settlement Boundary of Eccleshall. The submission was supported by technical evidence and Vision Document. The Site was put forward again in association with St Philips' comments on the Council's 'Scoping the Issues' consultation in September 2018.
- 1.6 The opportunity that is provided by the site is described in full the Vision Document submitted in support of these representations. The Vision Document has been updated since the 'Scoping the Issues' stage having regard to the content of an outline planning application for up to 37 dwellings (19/31613/OUT) submitted on the Phase 1 land. It continues, however, to promote the allocation of the Site for 30 dwellings (in addition to those to be accommodated on the Phase 1 land).
- 1.7 These representations respond to selected questions raised through the Issues and Options Consultation Document, February 2020. Responses are provided to those questions St Philips feels are the most critical to the Plan preparation process.

2. Response to Questions

Section 1 - Introduction

Qu.1.A. Is the evidence that is being gathered a suitable and complete list?

2.1 The evidence base referred to at Table 1 on page 12 of the Plan is evidence that is required to support the preparation of the New Local Plan. St Philips considers, however, that it is incomplete and that the LPA should develop further evidence to support the preparation of sound and robust policies and proposals which should include at least the following:

- a Site Selection Methodology explaining the Council's approach to the individual and relative merits assessments that it will undertake when identifying proposed site allocations;
- allied to the above, evidence of the approach that will be taken to the review of Settlement Boundaries that will be required to meet Local Housing Needs up to 2040;
- updated evidence on the deliverability of existing commitments (including delivery rates);
- a Strategic Transport Assessment, considering the highways impact and any mitigation (e.g. highway improvements) required to support the options considered;
- more detailed evidence in relation to any Garden Settlement to be promoted in the plan.

Qu.1.B. Have any key pieces of evidence necessary for Stafford Borough's new Local Plan been omitted?

2.2 Yes, as per our response to Question 1.A above.

Section 3 – Vision and Strategic Objectives

Qu.3.A. Do you agree that the Vision should change?

2.3 As a matter of principle, the Vision that was prepared at the time that the current Local Plan was adopted should be reviewed and updated to reflect the changes in national policy and approaches that have taken place since (which include the revised NPPF and updates to the Planning Practice Guidance (PPG)). Moreover, the Vision must respond to the opportunities and challenges that arise from the revised housing, employment and other development needs that are to be accommodated within the revised plan period (up to 2040). More specifically, the current Vision makes no reference to the need for new housing to be provided at a range of locations, and in a variety of small and larger sites, as required by the NPPF.

Qu.3.B. Do you agree that the Vision should be shorter?

2.4 St Philips thinks that a shorter and more focused Vision may be desirable, provided that is able to articulate the priorities and approaches that the New Local Plan must deliver over the plan period.

2.5 St Philips considers that the new Vision should repeat the emphasis of the current Vision on the development and delivery of high quality housing within the Borough, including affordable housing, but that it should be made clear that this will be at a variety of locations, and on sites of varying scale, including small sites, so as to fully meet Local Housing Need.

Qu.3.C. Do you agree that a new Vision, whilst maintaining a commitment to growth, should more explicitly recognise the need to respond to Climate Change and its consequences?

2.6 Paragraph 149 of the National Planning Policy Framework (NPPF, 2019) says that:

“Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.”

2.7 Moreover, the UK Parliament declared a climate emergency in May 2019. Consequently, St Philips supports the inclusion of greater emphasis than the current Vision on the need to take decisions and actions that will promote the approach at paragraph 149 of the NPPF.

Qu 3.D. Should the spatially-based approach to the Objectives be retained? Does this spatially-based approach lead to duplication?

2.8 St Philips supports the retention of a spatially based approach to the objectives, because this provides a means of articulating differing priorities and approaches that apply across a Borough that contains a diversity of settlements (in terms of their scale, function and role in meeting the housing, employment, retail and other needs to be met by the new Local Plan). Such an approach need not lead to duplication, if the new Local Plan were to be based also on a number of common objectives that would be universally applicable across the Borough, irrespective of the location of development. An example is that all new housing should be of a high quality, whether it is in Stafford, Stone or any other settlement.

2.9 Care should be taken, however, to ensure that spatially based objectives do not include imprecise terminology that may cut across the policies and proposals in the Plan. For example, the current objectives relating to ‘Areas outside Stafford and Stone’ include support for *“high quality new small scale housing development at appropriate villages that reflects their distinctive local character”*. There is no need to limit such development to *“small scale”* proposals (although the NPPF is clear that housing strategies should include for at least 10% of housing need to be met on sites of 1ha or less), certainly absent a definition of ‘small scale’. The appropriate approach to adopt is to support development proposals that respond appropriately to local needs and circumstances.

Qu.3.E. Is the overall number of Objectives about right?

2.10 St Philips does not consider that any particular number of objectives is right or wrong (it is the content of the objectives that is more relevant), but does consider that the new Local Plan provides an opportunity to review, refine and consolidate the objectives. If the new Local Plan retains a spatially based approach then a greater number of objectives is likely to be required than if it does not.

Qu.3.F. Should there be additional Objectives to cover thematic issues? If so what should these themes be?

2.11 As per our comment above, that will depend on whether the new Local Plan contains common and overarching objectives, in which case they will necessarily be thematic, or whether the Council continues with a spatially based approach, but avoids duplication by including also a set of common objectives.

Section 4 – Sustainability and Climate Change

4.A. Efforts to increase energy efficiency within the Borough are currently detailed in Policy N2 of the adopted Plan for Stafford Borough. However, the increasing recognition that more needs to be done to mitigate the effects of climate change suggests that measures in excess of this will now be necessary.

- a) **Should the new Local Plan require all developments be built to a standard in excess of the current statutory building regulations, in order to ensure that an optimum level of energy efficiency is achieved?**
- b) **What further policies can be introduced in the Local Plan which ensures climate change mitigation measures are integrated within development across the borough?**

- 2.12 Para150 (b) of the NPPF requires development to be planned for in ways that “can help reduce greenhouse gas emissions such as through its location orientation and design” and that “Any local requirement for the sustainability of buildings should reflect government’s policy for national technical standards”.
- 2.13 The Issues & Options refer at paragraph 4.14 to the Building Regulations (Part L). Consultation has taken place on changes to Parts L and F of the Building Regulations to increase the energy efficiency requirements for new homes as part of the consideration of a new ‘Future Homes Standard’. The consultation concluded on 7 Feb 2020. The consultation document notes that “as we move to the higher energy standards required by Part L 2020 and the Future Homes Standard, there may be no need for local authorities to seek higher standards and the power in the Planning & Energy Act 2008 may become redundant.” It says also that government is “considering whether to commence the amendment to the Planning & Energy Act 2008 which would restrict LPAs from setting higher energy efficiency standards for new homes”.
- 2.14 There appears to be no evidence published with the Issues & Options which would justify a need to depart, and go further, than the current statutory building regulations. Having regard to the recent consultation on the Building Regulations, St Philips does not consider that there is any justification at present for including a policy which would require all development to be built to a standard in excess of the current Building Regulations. Any development which can be built in excess of the current regulations, where both viable and feasible, should nonetheless be encouraged and supported.

Qu.4.B. Which renewable energy technology do you think should be utilised within the borough, and where should they be installed?

- 2.15 The use of renewable energy technology is promoted through the NPPF, with Paragraph 151 stating:
- “To help increase the use and supply of renewable and low carbon energy and heat, plans should:...*
- c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers”.*
- 2.16 As a matter of principle, St Philips would be supportive of renewable energy technologies being utilised within the Borough. St Philips would suggest, however, that policy should acknowledge that appropriate techniques will vary according the particular scale, location and content of development, so that it will not be appropriate to prescribe these matters in policy.

Qu.4.C. Should the Council introduce a policy requiring large developments to source a certain percentage of their energy supply from on-site renewables?

- 2.17 As mentioned above, St Philips would support the inclusion of advocacy policies to encourage the use of renewable energy technologies, including on-site methods, but with the feasibility and viability of their introduction to be assessed on a site by site basis.

Qu.4.E. Should the Council implement a higher water standard than specified in the Building Regulations

- 2.18 Paragraph 150 (b) of the NPPF says that local requirements relating to the sustainability of buildings should reflect the Government's policy for national technical standards. Paragraph 13 of the PPG stipulates that *"the LPA may also consider whether a tighter water efficiency requirement for new homes is justified to help manage demand."* Paragraph 14 of the PPG goes on to say that *"all new homes already have to meet the mandatory national standard set out in the Building Regulations (of 125 litres/person/day)"* but where *"there is a clear local need"* LPAs can set out policies requiring new dwellings to meet the tighter *"Building Regs optional requirement of 110 litres/person/day"*.
- 2.19 No evidence has been published with the Issues & Options which identifies a *"clear need"* to go beyond the national technical standards so that there is no justification to go beyond the national technical standards.

Section 5 – The Development Strategy***Qu.5.A. a) Do you consider that the existing Policy SP1 addresses the requirement of the NPPF? b) Do you consider that it is necessary to retain this policy in light of the recent change in Planning Inspectorate's view?***

- 2.20 There is no need for Policy SP1 to be retained in the new Local Plan, having regard to Paragraph 11 of the NPPF, which requires that both plan-making and decision-taking activities apply a presumption in favour of sustainable development. Moreover, the PPG states that *"there is no need for a plan to directly replicate the wording in paragraph 11 in a policy"* (Paragraph: 036 Ref ID: 61-036-20190723 Rev date: 23 07 2019).

Qu.5.B. a) Which Annual Housing Requirement figure do you think will best meet Stafford Borough's future housing growth requirements? What is your reasoning for this answer? b) Should a Partial Catch Up rate allowance be incorporated?

- 2.21 The starting point for the new Local Plan is for the LPA to calculate Local Housing Need (LHN) using the Standard Methodology. St Philips agrees that the figure that the LPA has included in the Issues & Options, of 408 dwellings per annum, correctly calculates LHN (using the 2014 Household Projections and applying the latest affordability ratio).
- 2.22 The NPPF is clear that the Standard Method generates an LHN figure that is the starting point for the preparation of Local Plans. Paragraph 11 confirms that *"strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses"* and paragraph 60 says that:

"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals".

- 2.23 Similarly the PPG advises that *"The standard method ... identifies a minimum annual housing need figure"* and emphasises that *"It does not produce a housing requirement figure"* (Paragraph: 002 Reference ID: 2a-002-20190220).
- 2.24 St Philips wishes to make the following points about the most appropriate annual housing requirement figure to be adopted in the forthcoming stages of the preparation of the new Local Plan.

Review of the Standard Method and Data Updates

- 2.25 The PPG is clear that a local planning authority, having calculated its LHN figure at the start of the plan-making process, should keep the number under review as the plan progresses, given that the inputs are variable over time, and revised where appropriate (Paragraph: 008 Reference ID: 2a-008-20190220).

- 2.26 Moreover, government has signalled its intention to carry out a review of the Standard Method. On 12 March 2020 Robert Jenrick advised the House that *"We'll be reviewing our approach to planning to ensure our system enables more homes to come forward in the places that people most want to live, with jobs, with transport links and other amenities on their doorstep"*. He announced on the same day that government *"will review the formula for calculating LHN taking a fresh approach which means building more homes but encouraging greater building in urban areas."* On the same day MHCLG published the 'Planning for the Future' consultation which refers to *"Reviewing the formula for calculating Local Housing Need"*.
- 2.27 Consequently, whatever figure is adopted must be kept under review as the new Local Plan progresses and as and when government adjusts the Standard Method. But, ahead of that, it would be appropriate for the LPA to note the intention that the review will support the object of building more homes, and to adopt a housing requirement figure that exceeds the minimum annual requirement derived from the Standard Method. This would build robustness into the preparation of the new Local Plan from the outset.

Market Signals

- 2.28 In relation to market signals, St Phillips has noted the completion rates that Stafford Borough Council has achieved and reported over the past three full reporting years. The spreadsheet at Gov.UK (Housing Delivery Test: 2019 Measurement) confirms that completion rates have been as follows.

• 2016/17	-	1,010
• 2017/18	-	863
• 2018/19	-	699
• Average	-	857

- 2.29 Whilst St Phillips notes the reduction in annual completions over the period, the average is very substantially above the minimum of 408 dwellings (by 449 dwellings) and, even in 2018/19, completions were 291 above the minimum figure derived from the Standard Method. Looked at over the five years from 2014/15 to 2018/19 the average annual completion rate was 737 (Table 2, Strategic Development Site Options).
- 2.30 The PPG also considers when it might it be appropriate to plan for a higher housing need figure than the standard method indicates and advises that:

"there may occasionally also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced SHMA) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests".

- 2.31 This further supports the setting of a Housing Requirement in excess of the Standard Method derived LHN.

Affordable Housing Need

- 2.32 Para 20 of the NPPF confirms that *"strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for: a) housing (including affordable housing)"*. The PPG confirms that strategic policy-making authorities *"will need to estimate the current number of households and projected number of households who lack their own housing or who cannot afford to meet their housing needs in the market"* (Paragraph: 019 Reference ID: 2a-019-20190220).
- 2.33 The Economic and Housing Development Needs Assessment (EHDNA) (January 2020) prepared by Lichfields considers the Borough's affordable housing need and estimates that *"there is a future affordable need in the Borough of between 252 and 389 dpa over the plan period"* (2020 to 2040) with the range reflecting alternative assumptions of the proportion of income assumed to be spent on housing (between 25% and

33%). The EHDNA acknowledges that the NPPF is clear that LPAs should seek to meet affordable housing needs and use their planning policies to maximise its delivery.

2.34 The range of affordable housing need identified represents between 61% and 95% of the LHN derived from the Standard Method. The following conclusions may be drawn.

- If the level of affordable housing need identified were to be met by s.106 obligations then, assuming that all sites qualified and delivered a policy compliant 30% affordable housing (as per the adopted Plan) then the housing requirement would need to be in the range of 840 to 1,296 per annum¹. St Philips notes that the average completions per annum reported for the purpose of the Housing Delivery Test from 2016 to 2019 has been similar to the lower end of this range (857 per year, on average).
- Looked at another way, adopting the LHN figure of 408 per year would deliver only 122 affordable homes per year, or only between 31% and 48% of the annual affordable housing need calculated by the EHDNA.

2.35 The simple conclusion to be reached is that, if the LPA is to achieve anything approaching the identified affordable housing need, it will need to significantly increase its housing requirement figure above the minimum LHN figure of 408 derived from the Standard Method. Even the highest of the housing requirements modelled (Option F applying a PCU) would only deliver 223 affordable units through s.106.

Economic Development Aspirations

2.36 The EHDNA notes the Council's ambitions in relation to economic development, and reports that the views of commercial property agents and other stakeholders interviewed as part of its preparation were that the Borough's industrial sector has been, and remains, strong. In addition, that the future prospects for advanced manufacturing and engineering were particularly favourable. The EDHNA considers various economic development and employment growth scenarios including Cambridge Econometrics (CE) baseline and regeneration scenarios, as well as scenarios based on past trends (job growth and land take-up) and on growth arising from a new Garden Community and Stafford Station Gateway developments.

2.37 Even the scenario with the lowest assumption over jobs growth would generate a housing requirement above the minimum LHN of 408 so as to ensure that jobs growth economic development are not constrained by a lack of housing to support the workforce. The scenarios range from 435 to 683, and from 489 and 746, with or without the Partial Catch-up rates (PCUs) applied.

2.38 Lichfields conclude that the need to accommodate a sufficient economically-active workforce to accommodate projected economic growth represents a reason why the LPA *"may consider identifying a higher housing requirement figure in its emerging Local Plan than the standard method"*.

2.39 Paragraph 20 of the NPPF advises that strategic policies should *"make sufficient provision for: a) housing (including affordable housing), employment, retail, leisure and other commercial development"*.

2.40 Paragraph 80 states that *"Significant weight should be placed on the need to support economic growth and productivity"* and paragraph 81 goes on to advise that:

"Planning policies should: a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration, taking into account both local business needs and wider opportunities for development".

¹ Noting that the Local Plan (Policy C2) requires differential Affordable Housing Rates with 40% in Stone and some KSVs

- 2.41 The Staffordshire and Stoke-on-Trent Local Enterprise Partnership (LEP) published the Consultation Draft version of its Local Industrial Strategy (LIS) in January 2020. The Foreword describes the LEP's ambitious approach to business growth and collaboration and sets out the aspiration *"to play a leading role as the UK meets the challenges of the 21st century, making the transition to a post carbon, more productive and more inclusive economy"* and to *"develop as a hot spot of business start up and growth"*.
- 2.42 In relation to Stafford in particular, the draft LIS notes that the town is *"ringed by business parks and industrial estates home to fast growing local businesses"*, that it is central to the UK's motorway networks, has easy access to local A-roads, and that the opening of a High-Speed integrated station through HS2 will:
- "drive regionally-significant housing and commercial growth over the next 30 years"*.
- 2.43 The draft LIS refers to growing demand and opportunity to bring more business investment to the town centre, and says that Stafford Gateway will provide a new business and commercial district adjacent on a 28-ha site next to the station. It also refers to the Meecebrook Garden Settlement as *"a major priority as it has the potential to deliver at least 10,000 new homes and 200ha of employment land"*.
- 2.44 The ambition of the LEP is substantial and clear both across its wider geography and focused on Stafford Borough. If the aspirations for economic development are to be realised, it is important that the ambition of the LIS is matched by setting an appropriate housing requirement, substantially above the LHN figure of 408. Neither the CE 'Baseline' nor the 'Jobs Boost' (CE Baseline plus 50% additional net growth) options (Scenarios D and G) reflect the strategy of the draft LIS. Scenario E accords most closely with the draft LIS, given that its assumptions are linked with the delivery of the Garden Settlement and Stafford Gateway.

Summary

- 2.45 Having regard to the above, and to the Government's objective of *"significantly boosting the supply of homes"* St Philips concludes as follows.
- a) The LHN figure of 408 dwellings per annum is correctly calculated.
 - b) The LHN figure will need to be kept under review both to reflect revised data inputs at Stages 1 and 2 of its calculation, and in the event that the government's commitment to update the Standard Method is met ahead of the submission of the new Local Plan.
 - c) Moreover, the LHN is expressly both a *"starting point"* and *"a minimum"*. There are no exceptional circumstances in this case that would support a lower housing requirement than the LHN. There are, however, a number of factors that support a substantially higher figure.
 - d) Market signals in the form of past completion rates indicate that the LHN is substantially lower than average annual completion rates over the 3 years reported in the 2019 HDT figures. It is, moreover, substantially lower than the current annual housing requirement of 500 dwellings.
 - e) The need for affordable housing is considerable (as assessed by Lichfields in the EDHNA) and far in excess of what could be delivered through the completion of policy compliant (30%) s.106 obligations. If the LPA is to get anywhere close to meeting affordable housing needs, as required by the NPPF, it must set a housing requirement substantially in excess of its LHN figure.
 - f) Having regard to the advice in the NPPF on the need to make sufficient provision for employment land, and to the ambitions of the LEP for Staffordshire and Stoke-on-Trent, and for Stafford in particular, the LPA should favour an economic development scenario that delivers substantially more jobs growth than the CE Baseline or Jobs Boost Scenarios (Scenarios D and G) with Scenario D not even matching the current annual housing requirement of 500 dwellings.

- g) Scenario E most closely matches the objectives of the draft LIS and proposes a housing requirement of at least 647 and up to 711 per annum. This would also make a more substantial contribution to meeting affordable needs.

Qu.5.C. In calculating the Housing Requirement figure for the New Local Plan 2020-2040 should a discount be applied to avoid a double counting of new dwellings between 2020 – 2031? If a discount is applied should it be for the full 6,000 new homes currently accounted for in the adopted Plan for Stafford Borough or a reduced number (please specify reasons)?

- 2.46 It would be appropriate in principle for the LPA to discount capacity on commitments and allocations when determining its housing requirement.
- 2.47 Beyond the point of principle, the LPA answers its own question by identifying the critical importance of establishing the genuine deliverability of the sites that make up its commitments and allocations. This is especially important in scenarios such as this where:
- the total asserted supply from commitments and allocations is very substantial at circa 6,000; and
 - discounting these elements of supply in full might support a stepped phasing strategy which would limit the scope for new permissions to be granted for a substantial part of the plan period (i.e. 2020-31).
- 2.48 The LPA has not published any evidence with the Issues & Options document to confirm its assumptions in relation to the delivery of dwellings from its commitments and allocations. St Phillips notes with some concern that the Issues & Options talks about *“approximately 3,000 planning commitments and 3,000 homes uncommitted on Strategic Development Locations totalling 6,000 homes which will be delivered in the overlap period of the two plans (2020-2031)”*.
- 2.49 Whilst acknowledging that the LPA is at an early stage of its plan-making process, the approximation of such substantial numbers, and the statement that the whole of this supply *“will be delivered”* is of concern given the implications for the housing requirement. The Issues & Options does not even list the sites that make up the *“approximately 6,000”* committed and allocated dwellings. If a discount is to be applied the assumptions that underpin the quantum of the discount, including trajectories for individual sites, should be clearly set out and subjected to scrutiny. The evidence presented at the next stage of the plan-making process should address the requirement of the PPG that *“in order to demonstrate 5 years’ worth of deliverable housing sites, robust, up to date evidence needs to be available”* (Paragraph: 007 Reference ID: 68-007-20190722). If there is any doubt over the deliverability of a site, the LPA should adopt a precautionary approach and remove that potential supply from its assumptions.
- 2.50 Once the LPA has assessed the deliverability of supply from commitments and allocated sites, it should then apply a non-implementation discount to the remaining supply (excluding, of course, completions since the start date of the new Plan Period). This would allow for the non-implementation, or delayed implementation, of allocated or permitted housing developments. This would have the effect of increasing the housing requirement so as to be in accordance with the Framework and ensure that the government’s objective to *“significantly boost the supply of housing”* is addressed by the housing strategy of the new Local Plan.
- 2.51 The LPA has also noted that applying a discount could impede the growth agenda represented by the Economic Growth Strategy. In this regard, St Phillips considers that the LPA must first decide on the most appropriate housing requirement, having regard to the various economic development scenarios modelled by Lichfields (as well as need to deliver affordable housing) which, as we have noted, would appear to be best aligned with Option E.

2.52 In summary, St Philips considers that:

- the application of a discount is, as a matter of principle, appropriate;
- the figure of 6,000 dwellings appears approximate and untested, and St Philips is concerned with the assumption at para 5.11 that this amount of housing “*will be delivered*” from these elements of supply;
- any discount must be thoroughly justified by reference to a full list of sites and clear evidence over the deliverability of those sites; and
- this will support robust assumptions over these elements of supply, which ought then be subject to a non-implementation allowance (excluding completions since the start of the plan period) to ensure that the new Local Plan is positively prepared and able to meet the requirements of the NPPF and PPG.

2.53 In advance of this, St Philips is able to conclude only that it is not appropriate to apply a full discount of 6,000 dwellings in determining the housing requirement for the new Local Plan.

Qu.5.D. i) Do you agree with the basis for the preparation of the 2019 Settlement Hierarchy?

2.56 The LPA consulted on the ‘New Local Plan Settlement Assessment’ in July 2018. St Philips commented on the Assessment with a focus on Eccleshall given their interest in the land at Castle Street. A copy of those comments is at Appendix 2 and may be summarised as:

- general agreement with the approach adopted to categorising settlements according to scale and the level of services that they provide; but
- a proposal that Eccleshall’s status should be elevated to that of a ‘Market Town’ to distinguish it from other settlements proposed to be categorised as Large Villages (500+ houses) given that (i) it is considerably larger than the other proposed Large Settlements, with the exception of Gnosall; (ii) that it contains a substantially greater level of service provision than others (which is not evident from the simple and unweighted ‘checklist’ of services and facilities in the Table at Section 7); and (iii) that it is better located relative to employment opportunities than the only comparable settlement in terms of scale and level of service provision (i.e. Gnosall).

2.57 St Philips supports the fact that Eccleshall is no longer referred to as a ‘Village’ as per the current Local Plan.

2.58 St Philips notes, however, that the Issues & Options document is proposing the same 6 Tier Settlement Hierarchy set out in the Settlement Assessment (although has deleted the ‘Rest of Borough’ category), and that it has not elevated Eccleshall above the other ‘Large Settlements’.

2.59 St Philips continues to consider that further differentiation is merited as part of the spatial strategy, and that the new Local Plan should appropriately differentiate Eccleshall from other Settlements at Tier 4 (Large Settlements), consistent with the following matters.

- First, its scale which, at 2,116 dwellings, is comparable with Gnosall at 2,114 (taken from Issues & Options p.159, Appendix 1) but is also, more pertinently, substantially greater than the scale of the other Large Settlements of Great Haywood, Little Haywood/Colwich and Hixon at 998, 966 and 819 dwellings respectively (taken from July 2018 Settlement Assessment, Appendix B, in the absence of data for those settlements at Appendix 1 to the Issues & Options).
 - Second, the substantially greater level of service provision in the town centre relative to the other Tier 4 Settlements. In this regard, the Town Centre Capacity Assessment for Stafford Borough (2019) prepared by PBA (Stantec) confirms that Eccleshall is the third largest centre within Stafford Borough, although contains less than a third of the number of units located within Stone Town Centre.
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Whilst Eccleshall Local Centre is said to serve local needs, it is notable that PBA confirm that the centre contains 44 retail/service units (as at the survey date) made up as follows.

Eccleshall Local Centre – Diversity of Use			
Category	No. of Units	% of Units	UK%
Comparison (A1)	18	40.9	37.2
Convenience (A1)	4	9.1	10.0
Retail Services (A1)	10	22.7	13.4
Professional (A2)	0	0.0	7.7
Food and Drink (A3-A5)	8	18.2	17.9
Miscellaneous	1	2.3	1.2
Vacant	3	6.8	12.7
Total	44	100	100

St Philips agrees with PBA's assessment that Eccleshall Local Centre is performing well and that, for a centre of its size, has a decent comparison retail goods offer. The convenience retail sector is dominated by Co-op, supported by three independent convenience stores (a baker, butcher and delicatessen). There are a number of hairdressers, barbers and beauty parlours, and only three vacant units at the time of PBA's survey. PBA note that Eccleshall is accessible by bus, that crime rates are low, and that the centre is very attractive.

This is an altogether more appropriate basis for considering the sustainability of Eccleshall both of itself and relative to other settlements than the simple record in the July 2018 Settlement Assessment that it contains 2 convenience stores (when in fact it contains four), and the rather misleading conclusion that it otherwise contains a post office and "4+" food/drink establishments. This is 37 fewer retail and service outlets than are actually present.

- Third, its relative accessibility to employment opportunities compared with other Tier 4 Settlements.

- 2.60 St Philips notes that the number of Large Settlements has reduced from 7 to 5, with Barlaston having been removed due to it being surrounded by green belt, limiting the scope for development (other than with a change to the green belt boundary), and also Yarnfield, which comprises a large brownfield site in the green belt which, similarly, has only limited capacity for growth. This does have the effect of giving some greater level of emphasis on Eccleshall as an appropriate location for new development.
- 2.61 St Philips notes that the Issues & Options document presents the Settlement Hierarchy as the '2019 New Settlement Hierarchy' and assumes that this is meant to confirm that it differs from that in the adopted Local Plan, rather than it being 'new' since the 2018 consultation.
- 2.62 Either way, paragraph 5.25 advises that *"The 2019 review revisits the work completed in 2018 (see the Settlement Assessment and Profiles) and includes existing commitments (to take into account currently permitted expansion) alongside settlement size and facilities/services. Each attribute is scored and the proposed Settlement Hierarchy derived from these scores (for details see the Settlement Assessment). The outcome of the 2019 Settlement Hierarchy review is summarised at Table 5.4"*.
- 2.63 Despite what is said, St Philips can find no evidence of any 2019 review. The links provided in the footnote to paragraph 5.25 of the Issues & Options are to the 2018 Settlement Assessment and Appendices. No new evidence or analysis is presented.
- 2.64 St Philips note that Table 5.3 sets out 'Growth experienced by the Key Service Villages in the current Local Plan (April 2011-March 2019)'.

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- 2.65 The Addendum comprises an updated Table to correct errors in the version in the consultation document. The Addendum revises downwards some of the percentage increases in settlement size (including from 27% to 23.8% at Eccleshall) and revises others upwards. The percentage increases at three of the other four Large Settlements are also revised downwards, with only Gnosall having an upward adjustment. We suspect that the revisions make little material difference to the approach that the LPA is promoting (and the Addendum does not include any narrative to suggest that it does make a difference). We would emphasise, however, that the commentary at 5.17 and 5.20 of the Issues & Options asserts an *“imbalance”* or disproportionate reliance on the former Key Service Villages that the new Settlement Hierarchy and spatial strategy ought to recognise and ‘re-balance’. St Philips comments on these matters as follows.
- a) Paragraph 5.16 states that some of the Key Service Villages (KSVs) have received a *“disproportionate amount of housing than others”*. Table 3 in the Strategic Development Site Options Study concludes, however, that when completions and commitments are considered together *“the percentages are generally in line the Plan’s target”* (para 2.21) and that the Key Service Villages have accommodated 12% of total housing provision since 2011 (as per the distribution identified in the adopted Part 1 Plan).
 - b) It is true that some KSVs have received more development than others, both in terms of absolute numbers of units, and also the percentage increase to the number of dwellings in the settlement. This is, however, to be expected within a settlement typology (Tier 4) that is broadly cast and contains settlements of substantially different scale, containing substantially different levels of retail and service provision, and with different levels of accessibility to employment opportunities either in the settlement or nearby. This is no more unexpected that Stafford accommodating more development than Stone, or Stone more than the KSVs, or the KSVs more than the rest of the District. It is entirely predictable, and wholly appropriate from the perspective of securing sustainable patterns of housing growth.
 - c) This supports St Philips’ view that Eccleshall (and, arguably, Gnosall) merit classification outside Tier 4, as they are more appropriate locations for development than the other Large Settlements.
 - d) St Philips does not, therefore, accept the merits of an approach that reaches apparently arbitrary conclusions on whether the distribution of development has been disproportionate to one settlement or another within a Tier of the Settlement Hierarchy that includes a diverse range of settlements. This is an ‘apples and pears’ approach and, in any event, the observation supports St Philips’ conclusion that the Settlement Hierarchy would benefit from greater differentiation in the Tier 4 ‘Large Settlement’ category.
 - e) We are also unsure how the percentages have been calculated. The Settlement Assessment in 2018 included information on the size of some settlements that in some cases differs substantially from the corresponding figures in Appendix 1, and by a greater extent than the number of dwellings granted figures in Table 5.3. Moreover, the 2018 Settlement Assessment (Appendix B) and the Issues & Options (Appendix 1) do not in all cases provide figures for both dates. The fact that the LPA has issued a revised version of Table 5.3 in the Addendum consultation is also of concern, as it makes the figures appear unreliable to the extent that respondents will be concerned about accepting them, and concerned about conclusions relating to the distribution of development that may be drawn from them.
 - f) Also of concern is that the Issues & Options does not explain how the LPA has reached conclusions on what constitutes ‘disproportionate’ growth, having regard to evidence of the capacity of each settlement to accommodate growth. Nor does it say which settlements the LPA considers may have experienced disproportionate growth. Those settlements may or may not include Eccleshall (or any other settlement for that matter).
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- g) St Philips' position, and our judgement, is that growth at Eccleshall has not been disproportionate, but has been appropriate having regard to its individual and relative merits in terms of sustainability criteria. Moreover, having regard to the points above, Eccleshall is clearly a sustainable settlement which has significant capacity to accommodate additional housing growth in the new Local Plan

2.66 Without the necessary clarification of the potential consequences of this issue for the distribution of growth in the new Local Plan, St Philips cannot reach any conclusion on the implications of the Settlement Hierarchy for the distribution of development, other than that:

- on the basis of the Council's own evidence base, the proportion of housing development to the KSVs has been in accordance with the spatial strategy and, therefore, entirely proportionate;
- St Philips considers that the growth of Eccleshall has been entirely appropriate and in line with its individual and relative merits in terms of scale and level of services and social infrastructure (and St Philips does not know whether the LPA shares this view, or whether it considers that the growth of Eccleshall has been disproportionate amongst the KSVs);
- past levels of growth are not, in isolation and of themselves, appropriate or reliable measures of the capacity of a settlement to accommodate additional growth and, provided that new development makes appropriate contributions to mitigate any impacts on the capacity of physical and social infrastructure, larger settlements will be generally more sustainable and should accommodate more rather than less new growth, irrespective of past growth; and
- the settlement hierarchy, as presently set out, does not go further than simply listing the tier in which settlements fall. Any distribution of development around the hierarchy based on apparently arbitrary judgements on whether settlements have, or may be, 'over-burdened' would not be sound.

2.67 St Philips maintains the view expressed at the 'Scoping the Issues' stage that the Settlement Hierarchy requires greater differentiation at the Tier 4 'Large Settlement' level to reflect the substantially different characteristics of the Tier 4 settlements and to support a spatial distribution of housing that accords with the principles of sustainability.

ii) Do you agree that smaller settlements should be included in the Settlement Hierarchy?

2.68 The NPPF supports the delivery of housing in locations which would "enhance or maintain the vitality of rural communities" and states that policies should "identify opportunities for villages to grow and thrive, especially where this will support local services". This applies to all settlements below Tier 2. St Philips considers that the growth of smaller settlements should be supported, only where future development will be sustainable. As previously stated, further work is required to establish which of the smaller settlements listed in the 2019 Settlement Hierarchy can sustainably accommodate growth over the plan period.

Qu5.F. a) In respect of these potential spatial scenarios do you consider that all reasonable options have been proposed? If not what alternatives would you suggest? b) Are there any of these spatial scenarios that you feel we should avoid? If so, why? c) Which of these spatial scenarios (or a combination) do you consider is the best option? Please explain your answer.

2.69 In relation to 5.F. a) St Philips considers that the LPA has identified all of the reasonable options in terms of broad 'spatial scenarios' having regard to the nature of the Borough and the settlements that it contains.

2.70 In relation to 5.F. b), St Philips is unsure of the extent to which the 'String' settlement/settlement cluster, or 'Wheel' settlement cluster, would be capable of delivering the most sustainable outcomes in the Borough as (i) they do not appear to make best use of existing infrastructure or access to existing concentration of

services; and (ii) do not appear likely to be able to deliver the level of new supporting infrastructure that may be achieved by the promotion of one or more Garden Communities.

- 2.71 Whilst the delivery of a Garden Community could contribute to the supply of large numbers of new homes (as acknowledged at paragraph 72 of the NPPF) it is equally clear that LPAs must make a realistic assessment of likely delivery rates and lead in times for such developments. Moreover, LPAs must identify a “sufficient amount and variety of land ... where it is needed” (NPPF paragraph 59) and should ensure that they allocate enough sites of less than 1 ha to accommodate at least 10% of its housing requirements.
- 2.72 Whilst St Phillips does not consider that any option should be pursued to the exclusion of all others, **Growth Option 5** may be the most appropriate, given that it promotes an approach that will:
- maximise brownfield development and opportunities to strengthen and diversify Stafford and Stone centres;
 - ensure that development would be distributed throughout the Settlement Hierarchy according to the individual and relative sustainability of settlements, and with a clear emphasis on the most sustainable and accessible settlements in the District (which includes Eccleshall);
 - enable some growth of Medium and Small Settlements and so support and potentially enhance the vitality of rural communities;
 - deliver by its nature a wide variety and mix of strategic and non-strategic sites of varying scale optimising the prompt and sustained delivery of supply across the plan period.
- 2.73 The relative merits of the Growth Options will become clearer as the LPA further evaluates the potential contribution from one or more Garden Communities.

Qu.5.G. Do you consider that the consideration and utilisation of a new Garden Community/Major Urban Extension (or combination) would be helpful in determining the approach to satisfying Stafford Borough’s future housing and employment land requirements? If you do think the Garden Community/MUE approach is appropriate which of the identified options is most appropriate? Please explain your answer.

- 2.74 As a matter of principle, St Phillips recognises the advantages that Major Urban Extensions and/or Garden Communities may bring in terms of the delivery of a substantial amount of new homes over a sustained period, as per paragraph 72 of the NPPF. At the same time, St Phillips does not consider that it would be appropriate for the LPA to contemplate more than one Garden Community (if any) as that would place too great a reliance on housing delivery from long term and very large sites. It would also raise consequent concerns about the ability of the new Local Plan to deliver a variety and choice of sites and to maintain a 5 year supply of housing land throughout the Plan Period.
- 2.75 St Phillips notes that the author of the Strategic Development Site Options report (AECOM) advises that the purpose of the Study is to “provide a strategic review of opportunities and constraints at a number of locations in the Borough that emerged as options for growth through the recent Stafford Borough Strategic Housing and Employment Land Availability Assessment (SHELAA) exercise, and any others”. It is a strategic and high level assessment of options, and does not comprise the detailed evidence base that is needed to reach robust conclusions on the deliverability of any of the options considered. St Phillips reserves the right to comment on further evidence that will be needed to support the selection of any of the options.

Qu.5.H. i) Do you agree that the only NPPF-compliant Growth Options proposed by this document are No. 3 (Disperse development across the new settlement hierarchy) and No. 5 (Disperse development across the new settlement hierarchy and also at the Garden Community / Major Urban Extension) and No. 6 (Concentrate development within existing transport corridors)?

ii) If you do not agree what is your reason?

iii) Do you consider there to be any alternative NPPF-compliant Growth Options not considered by this document? If so, please explain your answer and define the growth option.

- 2.76 St Philips agrees that Growth Option 1 (Stafford and Stone only), Growth Option 2 (Stafford, Stone and Key Service Village focussed development) and Growth Option 4 (Garden Communities Only) should not be favoured given that none of these options appear capable of meeting the full range of policy guidance in the NPPF relating to the location and distribution of housing.
- 2.77 St Philips considers that Growth Options 3 and 5 (which are essentially the same but one with and one without a Garden Community as an element of supply) are capable of satisfying the requirements of the NPPF, but is less certain in relation to Growth Option 6 given our comments at paragraph 2.68 above.
- 2.78 St Philips is concerned, however, that the approach that is taken to the dispersal of development across the Settlement Hierarchy in Growth Option 3 (and also 5) is critical to the ability to deliver a sound housing strategy. Paragraph 5.46 of the Issues & Options says that the Growth Option 3 “*would propose*” to distribute growth as follows.
- Stafford - 50-70%
 - Stone - 10-20%
 - North Staffs Urban Areas - 5%
 - Large Settlements - 10-20%
 - Medium Settlements - 5-10%
 - Small Settlements - 5-10%
- 2.79 The application of these ranges could have very different consequences for the variety, scale and location of housing delivery around the Borough. One possible scenario would see 90% of the housing requirement in Stafford and Stone and only 10% at Tiers 3-6. At the other end of the scale, 60% of the housing requirement could be in Stafford and Stone, with 40% at Tiers 3-6.
- 2.80 Looking only at the Tier 4, 5 and 6 Settlements, one scenario could see the Tier 4 settlements accommodate only 10% of the housing requirement, but the Tier 5 and 6 Settlements (which by definition are less sustainable locations for growth than Tier 4 Settlements) accommodate double that at 20% of the housing requirement. With this in mind, St Philips considers that the LPA should consider:
- Capping the maximum proportion of housing that may be delivered at Tiers 1-3 ;and/or
 - Setting a minimum proportion to be allocated to the Tier 3 Settlements to ensure: and/or
 - Narrowing the range of provision at each Tier.
- 2.81 Moreover, St Philips continues to propose that Eccleshall be given greater emphasis in the Settlement Hierarchy than other settlements at Tier 4 so as to reflect the clear advantages that Eccleshall has over those other settlements as a location for sustainable growth.

Qu.5.I. Do you think that it is appropriate, in order to take the development pressure off the existing settlements in the Settlement Hierarchy, that at least one Garden Community should be incorporated into the New Local Plan? Please explain your answer.

- 2.82 As a matter of principle, ‘yes’, but subject to the comments made in answer to questions 5 D, F, G and H.

Qu.5.J. What combination of the four factors:

- 1. Growth Option Scenario (A, D, E, F, G);***
- 2. Partial Catch Up***
- 3. Discount / No Discount***

4. No Garden Community / Garden Community

should Stafford Borough Council put forward as its Preferred Option at the next stage of this Plan-Making process? Please explain your answer.

- 2.83 Having regard to the answers that we have given to the preceding questions relation to the housing requirement, the Settlement Hierarchy and the Growth Options we consider at this stage, and ahead of the preparation of the additional evidence base that we have said is required, St Phillips' position may be summarised as follows.
1. Growth Option Scenario (A, D, E, F, G) – a preference for Option E
 2. PCU – no view expressed at this stage
 3. Discount/No Discount – as a matter of principle, a discount may be applied but the quantum of that discount must be thoroughly tested to ensure that the housing requirement is not reduced as a consequence of unjustified assumptions over delivery from commitments not yet started and allocations carried forward
 4. Garden Community/No Garden Community – potentially, subject to evidence that this option would be deliverable and genuinely sustainable, and in any event only as part of a balanced portfolio of sites that includes provision for development at Tier 4 of the Settlement Hierarchy (or any different Tier that Eccleshall is elevated to).

5.Q. Do you agree with the methodology used to define settlement boundaries? If not please provide reasons for your response.

- 2.84 The Issues & Options consultation document sets out the methodology that has been used to define the settlement boundaries. As a starting point, the document states that *“settlement boundaries are based on the settlement boundaries that have previously been drawn for the Plan for Stafford Borough Part 2 (adopted 2017) and the criteria set out in the adopted Spatial Principle 7, together with the Methodology section of the PFSB Part 2 (adopted 2017)”*. The document then goes on to show the three-stage process which will be used to review and establish new settlement boundaries during a subsequent stage of consultation through the New Local Plan for Stafford Borough process.
- 2.85 The methodology effectively describes a mapping exercise (Stage 1) followed by corroboration of data on the ground (Stage 2). Stage 3 is described as 'Incorporation of Development Principles'. The text relating to Development Principle 1 describes how the LPA will go about defining recognisable boundaries.
- 2.86 Development Principle 2 confirms that sites subject to commitments will be included in the settlement boundary, and that *“small scale development opportunities which would provide infill and rounding off opportunities that are physically, functionally and visually related to the urban area taking account of any environmental development constraints”*. The text does not define 'small scale', or explain how functional or visual relationships are to be assessed and tested, or what weight will be given to any particular constraints. There is no reference to other important factors such as relationship to public transport links, to the services within the settlement, or to other sites that may be committed for development. This gives no indication of the scale of development that might be accommodated by *“infill and rounding off”* or how that may be considered relative to the distribution of the housing requirement around the Settlement Hierarchy.
- 2.87 Moreover, the text is silent as to how the LPA will go about considering the individual and relative merits of sites other than those which would comprise infill and rounding off opportunities; that is, the merits of sites promoted through the Call for Sites exercise and by way of representations to the draft Local Plan process that, if supported by the LPA, would require an amendment to the Settlement Boundary.

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- 2.88 On this basis, St Philips does not consider that the LPA has provided a methodology that it can respond to. The LPA must set out in detail how it will approach site selection, adopting a rational, evidence based approach that will be capable of consistent application across all sites under consideration and against which the relative merits of competing sites may be assessed leading to the selection of preferred options. St Philips recommends that the methodology be prepared and published for consultation very soon, so that it is clear what approach it will be taking to the identification of preferred site options, and to consequential amendments to Settlement Boundaries.
- 2.89 St Philips notes also that paragraph 5.95 says that settlement boundaries “*exclude open areas of land (public open space, allotments, school playing fields) on the edges of settlements, unless appropriate for general development*”. The land to the south of the Site that is promoted in these representations comprises open land, but lies within the Settlement Boundary. It is, therefore, a preferred and appropriate location for development, which was confirmed recently by officers in their report on application19/31613/OUT. The LPA should confirm that the new Local Plan will not exclude from Settlement Boundaries land that is currently included in the adopted Settlement Boundary, and which has been included following consideration of its potential to accommodate development.
- 2.90 It is also unclear from paragraph 5.95 on what basis the LPA will conclude that land is “*appropriate for general development*”. As identified through these and previous representations, St Philips considers that the land at Castle Street accords with Design Principle 1, being adjacent to the current settlement boundary and contained by a defensible boundary to the north (a tributary to the River Sow).

2.91 Section 7 – Delivering Town Centres that address Future Needs

Qu7.A a) Do you consider that the hierarchy for Stafford Borough should consist of Stafford and Stone town centres with Eccleshall Local Centre? If not, please give a reason for your response.

- 2.92 St Philips agrees that the hierarchy of centres in Stafford Borough should include Eccleshall Centre given its importance to the sustainability of the town. St Philips proposes, however, that the centre should be termed a ‘Town Centre’ given the range and amount of Class A and other services and uses that it contains. This would be consistent with the definition in the Glossary to the NPPF and would more accurately reflect its role and the status of Eccleshall.

2.93 Section 8 – Delivering Housing

8.A. Should the council continue to encourage the development of brownfield land over greenfield land?

- 2.94 NPPF Paragraph 117 states that “*Strategic policies should set out a clear strategy for accommodating objectively assessed housing needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land*”. On this basis St Philips agrees that, as a matter of principle, the Council should encourage the development of brownfield land in the first instance.
- 2.95 However, paragraph 7.69 of the Sustainability Appraisal, prepared by Aecom (January 2020) states that: “*Given the scale of the development required in Stafford Borough over the plan period it will likely be necessary to allocate a level of greenfield land under all Options, as there is insufficient previously development land in sustainable locations available to meet the requirements.*”
- 2.96 If, therefore, the Council is unable to identify sufficient ‘deliverable’ brownfield sites to meet its housing and employment needs through the SHELAA and Brownfield Register (accounting for any minimum density standards) it should then look to ‘deliverable’ greenfield land in the most sustainable locations for housing and employment in the Borough outside of the Green Belt. This will include land adjacent to sustainable
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settlements such as Eccleshall. As demonstrated by the Vision Document submitted with these representations, the Site represents a sustainable, available and deliverable development option.

8.B. Do you consider that the enforcement of minimum density thresholds would have a beneficial impact on development within the borough? If so, do you consider: the implementation of a blanket density threshold; or a range of density thresholds reflective of the character of the local areas to be preferable? Why do you think this?

- 2.97 Paragraph 123 of NPPF sets out “Where there is an existing or anticipated shortage of land for meeting identified needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site”. This policy goes on to state that

“(a) plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include locations that are well served by public transport...”

“(b) use of minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range”

- 2.98 Having regard to paragraph 123 b), and to the fact that the Borough contains a wide range of settlements with their own individual qualities and characteristics, St Phillips would not support a blanket minimum density standards for housing throughout the Borough. St Phillips could, however, support policy that proposes a range of densities to be used as a guide to support development proposals, but with the flexibility to depart from these when appropriate having regard to the local context and individual site specific features.

8.C. Do you think that any adopted minimum density thresholds should reflect the availability of sustainable travel in the area?

- 2.99 This could, in principle, be acceptable but would be most applicable to sites within Stafford and Stone. Moreover, any such policy should make it clear that that other factors impact on appropriate densities so that the policy would be applied on a pragmatic basis, especially outside the Tier 1, 2 and 3 locations.

8.E In the New Local Plan should the Council

a) Apply the Nationally Described Space Standards to all new dwellings, including the conversion of existing buildings? b) Only apply the Nationally Described Space Standards to new build dwellings? c) Not apply the Nationally Described Space Standards to any development? Please explain your answer.

- 2.100 Paragraph 127 Footnote 46 of the NPPF, states that “policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified”. The Issues & Options Consultation document does not supply or refer to any evidence which demonstrates that there is a need for the Local Plan to include policies which require the application of the National Described Space Standards to all new dwellings.

8.F Do you consider that the housing mix detailed in the table above will be sufficient in meeting the needs of all members of the community?

- 2.101 Paragraph 61 of the NPPF requires that planning authorities assess the size, type and tenure of housing that will be needed for different groups in the community. This is partly focused on affordable housing but also on housing for older people and people with disabilities, families, students and those who may wish to build their own homes. St Phillips agrees in this context that the new Local Plan should cater for a diverse range of

needs. Some may be covered by policies relating to self-build, student accommodation and travellers. More generally, diverse needs will be best met by a housing strategy that includes a range and choice of site size and location.

- 2.102 St Philips assumes, however, that Question 8.F is posed on the basis that the LPA may be proposing to include a policy in the new Local Plan that will seek to control to some extent open market and affordable housing mix. It would have been useful if this had been made clear, and helpful also if the Issues & Options had confirmed whether any such policy would be drafted on a prescriptive or advocacy basis.
- 2.103 St Philips agrees that a mix of size and types of homes should be delivered across the plan period to meet the needs of different groups, and that this objective may be best served by including a policy that will seek to ensure that a mix is achieved. Specific needs and demand will however vary across the Borough according to location (e.g. whether close to or within the main centres, in suburban or rural locations). On this basis St Philips considers that any such policy should not be prescriptive, but should advocate a housing mix based on broad ranges expressed as targets across the Borough as a whole, and with it made clear that the mix will be negotiable on a site by site basis, within the broad target ranges expressed. Such an approach would ensure also that the Local Plan would be flexible enough to accommodate changing local market conditions over its 20 year life.

8.H. Should the Council consider a policy requiring 10% of affordable homes delivered on new major development sites to be wheelchair accessible?

- 2.104 A blanket policy requiring 10% of affordable homes to be wheelchair accessible is likely to be onerous and unduly restrictive to new development. The level of accessible housing to be provided on any particular site should be based on site specific assessment, taking into account of evidence of local need and informed by a robust and up-to-date viability study.

8.I. a) Should the Council consider a policy requiring bungalows to be delivered on all major developments? If so, should there be a minimum number or proportion of such bungalows for each development?

b) Should the amount of land required for such bungalows be reduced by either limiting their garden size or encouraging communal/shared gardens? c) Is there a need for bungalows to be delivered in both urban and rural areas? d) Are there any other measures the Council should employ to meet the demand for specialist housing within the Borough of Stafford?

- 2.105 Similar to our response to question 8.F, policies within the new Local Plan should not seek to impose a blanket requirement for any particular style or type of dwelling, including bungalows, to be delivered on all major development. Opportunities should be considered on a settlement by settlement basis, taking into account the findings of any Local Housing Need Assessment.

8.K. a) Do you consider an affordable housing provision of between 252 and 389 units pa to be achievable?

b) In the instance whereby a lower provision of affordable housing is sought, would the supplementary supply of a diverse range of market housing in accordance with the findings of the EDHNA be sufficient?

- 2.106 The provision of between 252 and 389 units per annum through s.106 obligation is not achievable based on the LHN derived from the Standard Method, or on the basis of any of the alternative housing need figures suggested. If the LPA is to get anywhere close to meeting affordable housing needs, as required by the NPPF, it must set a housing requirement substantially in excess of its LHN figure.

Section 9 – Delivering Quality Development

9.B. How should Plan Policies be developed to seek to identify opportunities for the restoration or creation of new habitat areas in association with planned development, as part of the wider nature recovery network?

9.C. Should the New Local Plan: a) Continue to protect all designated sites from development, including maintaining a buffer zone where appropriate; b) Encourage the biodiversity enhancement of sites through development, for example, allocating sites which can deliver biodiversity enhancement; c) Require, through policy, increased long term monitoring of biodiversity mitigation and enhancement measures on development sites.

- 2.107 Paragraph 174 of the NPPF explains that plans should be prepared so as to “identify, map and safeguard” designated sites, so that St Philips supports an approach which seeks to protect designated sites through the Local Plan. There is, however, no basis in national policy or guidance for local plans to introduce buffer zones around designated sites. In relation to (b) St Philips notes that the LPA refers to encouraging the biodiversity enhancement of sites by allocating sites that can deliver biodiversity enhancement. Whilst that may be one approach, St Philips would be concerned if that were to be considered a pre-requisite to allocation as not all sites can deliver biodiversity enhancements on-site, and a requirement to do so could conflict with, for example, the emphasis on delivering housing and other development on brownfield sites.

9.G. Should the new Local Plan set out specific policies to require new development to minimise and mitigate the visual impact that it has on the Character Areas and quality of its landscape setting?

- 2.108 The Local Plan should include a policy which relates to the landscape and visual impact of new development. However, in accordance with paragraph 170 of the NPPF any such policy should focus on “protecting and enhancing” valued landscapes, “recognising” the intrinsic character and beauty of the countryside and ensuring that new developments are “sympathetic” to character and landscape setting in accordance with paragraph 127.

9.I. Should the new local plan: 1. Adopt a broad definition of historic environment encompassing a landscape scale and identification with natural heritage rather than the current protection of designated heritage assets approach? 2. Take a broader and more inclusive approach by explicitly encouraging the recognition of currently undesignated heritage assets, settlement morphology, landscape and sight lines? 3. Require planning applications relating to historic places to consider the historic context in respect of proposals for e.g. tall buildings and upward extensions, transport junctions and town centre regeneration. 4. Encourage the maximisation of the wider benefit of historic assets by their incorporation into development schemes through imaginative design. 5. Consider historic places and assets in the context of climate change permitting appropriate adaptation and mitigation measures.

- 2.109 St Philips considers that the statutory duties relating to development that may affect designated heritage assets, and the policy and guidance in the NPPF and PPG that deals with both designated and non-designated heritage assets, provides a sufficient framework for the control of development affecting such assets, so that no additional or different measures of control are either necessary or justified.

9.J. Do you consider that the current “Design” SPD provides sufficient guidance for design issues in the Borough? Please explain your rationale.

- 2.110 The Design SPD was adopted prior to the publication of the National Design Guide, in October 2019. As a result it would be appropriate for the Council to review and if necessary update the SPD to ensure consistency with the National Design Guide.

9.L. To support a new Local Design Review Panel should the new Local Plan: a. Require complex or Large-Scale Development to be subject to review by a Regional Expert Design Panel, to form a material consideration in the planning decision? b. To adopt (and commit to delivering), nationally prescribed design standards; e.g. Manual for Streets, Building For Life, BRE Homes Quality Mark, etc. c. Reconsider and update local design policies to more robustly reflect current national best practice, be based upon local Characterisation studies, and be specifically aligned with related and companion policy areas to support the wider spatial vision for the Borough.

- 2.111 No, the new Local Plan should not require always that complex or large scale development be subject to Design Review, not least because 'complex' and 'large scale' are imprecise terms and, moreover, because some 'complex and large scale' developments may not require Design Review whereas smaller and less complex schemes might. In addition, Design Review may be add unnecessary cost and delay into the determination process.
- 2.112 There is a risk also in adopting an approach which implies that the LPA assumes that all proposals for large and complex proposals will be inadequate in terms of their design quality. The LPA ought to be able to reach a judgment on a case by case basis, involving the Applicant in the decision, and make appropriate and selective use of Design Review accordingly.
- 2.113 More generally the new Local Plan's design based policy should have regard to the relevant advice in the NPPF, PPG and National Design Guide.

3. Land off Castle Street, Eccleshall

3.1 This section summarises St Philips' proposals for the land that it controls to the east of Castle Street in Eccleshall. It does so by reference to content of the Castle Street, Eccleshall - Vision Document that is provided at Appendix 1. The preparation of the Vision Document has been underpinned by a suite of technical and environmental assessments. The Vision Document has been presented to the LPA previously, but has been updated to take into account changes in circumstance since it was last submitted, principally in relation to the land to the south of the Site, which is also controlled by St Philips, and which has recently been subject to an outline planning application.

Site Context and Phase 1 Land

3.2 St Philips controls land to the east of Castle Street which falls part within and part outside the Settlement Boundary for Eccleshall as defined in the Stafford Borough Local Plan Part 2 and the Eccleshall Neighbourhood Plan. The land extends from the existing settlement edge as far north as the tributary to the River Sow. It is bound to the west by Castle Street.

3.3 That part which falls inside the Settlement Boundary is referred to as 'Phase 1'. That part which falls outside the Settlement Boundary is the subject of these representations and is referred to as 'the Site' and as 'Phase 2'. The Settlement Boundary is shown on the Site Location Plan at page 11 of the Vision Document.

3.4 The Phase 1 land was recently subject to an outline planning application for up to 37 dwellings (19/31613/OUT). The application was supported by a Design & Access Statement and Indicative Layout Plan. All of the buildings, their curtilages, access and estate roads and formal and informal public open space were contained inside the Settlement Boundary. Only one element, a 'soft engineered' drainage feature, was located outside the Settlement Boundary.

3.5 The application was refused on 8 April 2020. The single reason for refusal notes that part of the application site (that which contains the drainage feature) is outside the Settlement Boundary and is, for the purpose of the application of policy, in open countryside. Officers assumed that the attenuation feature would be a large urban feature, out of character with its rural location, and so contrary to Spatial Principle 7 and Policies E2, C5 and N1 of the Plan for Stafford Borough.

3.6 Despite this 'technical' reason for refusal, the officer's report confirms that the development of the site for housing would be wholly appropriate, and that it would be acceptable in all other respects. The report notes amongst other matters that officers agree that:

- a) the site has the capacity to accommodate the development of proposed housing without compromising any defining landscape or visual characteristics at any scale;
- b) no objection should be raised in relation to the visual impact of the development;
- c) less than substantial harm would occur to the significance of nearby designated heritage assets (the Scheduled and Grade II* Listed Eccleshall Castle and the Conservation Area);
- d) neither the EA nor the LLFA raise any objection in relation to flood risk and drainage matters;
- e) the Biodiversity Officer encourages the carrying out of various habitat measures in due course;
- f) Natural England does not consider that there is likely to be any significant impact on the Cop Mere SSSI and RAMSAR site, nor on any other designated nature conservation site;
- g) the Tree Officer raises no objection subject to tree protection measures; and

h) there are no objections on highway grounds subject to conditions.

3.7 Officers concluded that bringing forward the land within the Settlement Boundary would provide social and environmental benefits in terms of sustainable housing provision including 40% affordable housing. If the whole of the site were within the Settlement Boundary, officers concluded that approval of the application would have been consistent with the strategic aims of Policies SP1, SP2, SP3 and SP4 of The Plan for Stafford Borough to secure sustainable housing development. As part of the application site was outside the settlement boundary, however, officers considered that approval of the application would not be consistent with Policy SP7, insofar as that part of the site was concerned.

3.8 St Philips will continue to promote the development of the Phase 1 land, in the context of the clear acceptance by officers that the site represents a sustainable option for the delivery of housing being (i) with the current Settlement Boundary; and (ii) demonstrably acceptable in relation to all technical, environmental, design and amenity based considerations. St Philips expects that permission will be granted, either on appeal or by way of a resubmission.

The Site (Phase 2)

3.9 We have explained the position with the Phase 1 land because:

- the Site subject to these representations is promoted as an extension to the Phase 1 land, and as an extension to the Settlement Boundary, so that the position with the Phase 1 land is of relevance to these representations; and
- the consideration of the Phase 1 outline planning application has confirmed that this general location is capable of accepting development without creating conflict with the various technical, environmental, design and amenity based considerations that are relevant to the assessment of the deliverability of this Site, and to decisions on new site allocations at Eccleshall as part of the new Local Plan process.

3.10 The Vision Document and Concept Masterplan describe a comprehensive development proposal, which builds strongly from the established position that residential development on land to the north of Eccleshall represents a sustainable direction of growth, and is capable of being successfully integrated with both the town to the south and countryside to the north.

3.11 The Concept Masterplan confirms the following key principles in relation to the Site promoted by these representations.

- **Access and Movement:** The site is well connected to the surrounding urban area, with easy access to public transport services and strategic highway links. The eastern side of Castle Street provides a suitable frontage for a new vehicular access.
- **Local Facilities:** The site is well positioned in terms of access to local facilities and services, as shown on the plan at p.15 of the Vision Document. In this regard we have explained at paragraph 2.59 of these representations that the level of service provision in Eccleshall Centre is very good and significantly greater than in other Tier 4 Settlements.
- **Flood Risk and Drainage:** The River Sow flows along the northern site boundary. There are two land drains that converge with the River Sow, located along the eastern and north-western site boundaries. A minimum easement of 9m to the river and the land drain will be incorporated into any proposals. The most recent EA flood maps show that the majority of the site falls within Flood Zone 1, although there is an area to the north east of the site which falls within Flood Zones 2 and 3. This area will, however, be left as open space. Surface water from the proposed development will be drained by a Sustainable Drainage System (SuDS).

-
- **Ecology and Biodiversity:** A Preliminary Ecological Assessment has been carried out, with subsequent protected species surveys, recommendations and enhancements detailed in the Ecological Appraisal for the site. The only protected species surveys required are in relation to bats, but given the intention to retain most or all mature trees, the potential for impacts on bat roosts is very low.
 - **Cultural Heritage:** An archaeological and cultural heritage assessment has been undertaken. The Site does not contain any designated heritage assets. It is located approximately 180m east of the Scheduled and Grade II* Listed Eccleshall Castle and also lies adjacent to Eccleshall Conservation Area, and north-east of the Grade I Listed Church of the Holy Trinity. The proposals should consider the sites proximity to these assets, and ensure that their settings are respected. At this stage, St Philips concludes that the location of the Site relative to the Phase 1 land, and the conclusions reached by officers in relation to the outline planning application, indicate that there are no constraints relating to heritage.
 - **Trees:** The majority of tree cover is to be retained due to its location in the northern part of the site and that residential parcels would be in the southern part of the Site. New tree planting would be provided across extensive areas of green open space that is proposed, so that the proposals should be considered an opportunity to improve and increase tree cover in the local area without the loss of any arboriculturally significant trees.
- 3.12 The proposal would provide **30 dwellings** (or up to 67 in combination with the land to the south).
- 3.13 Overall the development of the site, in combination with the land to the south, and organised within a comprehensive masterplan, provides an opportunity to accommodate new development as a logical and natural extension to the town and with the River Sow tributary providing a firm physical boundary to the north. The proposals will follow best practice urban design principles, and will be structured to form a legible and permeable development.
- 3.14 The proposal also provides an opportunity to support an aspiration of the Eccleshall Neighbourhood Plan to incorporate a publicly accessible riverside park. This strategy is a response to the setting of the site and to the nature and character of the spaces along the northern boundary. The parkland would have a naturalistic planting pattern of new waterside trees that are typical of the meadows along the River Sow in Eccleshall. The residential development will be set in a new landscape of wildflower meadow and will provide areas of amenity open space and formal play facilities that encourage social interaction and community use.
- 3.15 Given the extent of technical and other due diligence and assessment that has been undertaken, St Philips is confident in confirming that the Site represents both a logical extension to the Settlement Boundary but also that it may be allocated with confidence that it is:
- **available now** - with St Philips having control of both the Site and the land to the south;
 - **suitable** - having regard to the various technical and environmental assessments undertaken across the wider site and to the conclusions that are reached in the Vision Document and
 - **achievable** – there being a realistic prospect that the site will be delivered within 5 years

Avison Young

April 2020

Appendix I

Vision Document



CASTLE STREET

- Eccleshall -

Vision Document | April 2020



ST PHILIPS

Barton Willmore / [REDACTED]

Desk Top Publishing and Graphic Design by Barton Willmore Graphic Design

This artwork was printed on paper using fibre sourced from sustainable plantation wood from suppliers who practice sustainable management of forests in line with strict international standards. Pulp used in its manufacture is also Elemental Chlorine Free (ECF).

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Date 21.04.2020 **Status** Final Rev F

Contents

The Vision	4
1. Introduction	6
2. Planning Policy Context	8
3. Assessing the Context: Local	12
4. Assessing the Context: The Site	22
5. Design Principles	38
6. Summary of Aspirations	42

The Vision

The proposals for Castle Street, Eccleshall will ensure the creation of an attractive and high-quality development where people aspire to live, celebrating the exiting landscape assets of the site and its immediate setting.

The site will bring forward additional land immediately adjacent to the existing settlement boundary. St Philips control the land to the south of the site (known as Phase 1). The Phase 1 land is already a preferred and suitable location for housing being located within the settlement boundary.

Our key aspirations for the site are:

- » Create a **distinctive identity** for the development of the site, that responds to the positive elements of the existing built form of Eccleshall and ensures a successful and attractive fit into the local setting.
- » Deliver housing in a location that benefits from a **sustainable location**, close to key village facilities.
- » Promote **community cohesion** through the provision of high quality, safe places for interaction that benefit both the new and existing community.
- » Inspire well-being through the provision of new, attractive **multifunctional green-infrastructure and country park**, encouraging physical exercise and healthy lifestyles choices.





I. Introduction

The Site

This Vision Document has been prepared by St Philips to promote the land east of Castle Street, Eccleshall as a sustainable development proposal capable of delivering 30 new dwellings.

This document has been prepared to assist in the promotion of the site through the Stafford Borough Local Plan Review. It is acknowledged that this is the start of the process, and St Philips is committed to undertaking further technical work as required and to consult widely with the local community, including local businesses and key stakeholders, to refine and develop the strategy.

St Philips consider that the land east of Castle Street, Eccleshall should be allocated for residential development in the Stafford Borough Local Plan Review to assist in meeting the Borough's housing needs.

The key objectives of this Vision document are:

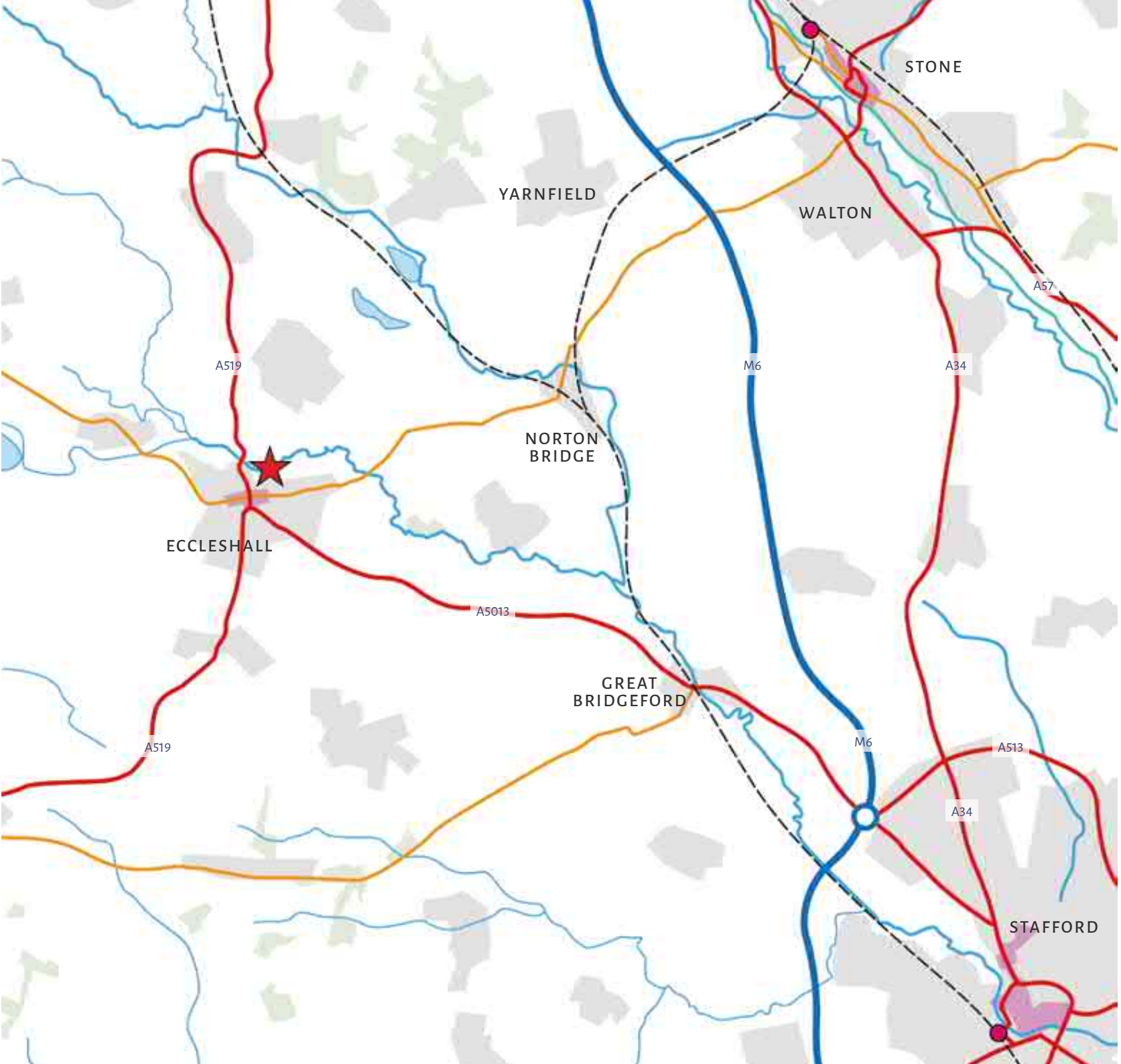
- » To provide an up to date assessment of the land east of Castle Street, Eccleshall that demonstrates the site is an appropriate, sustainable and deliverable location;
- » To assist further discussions with the Local Planning Authority, relevant stakeholders and the local community; and
- » To set out the vision for the site and show how this can be realised through the provision of a Concept Masterplan.

We have noted that St Philips controls also the 'Phase 1' land to the south of the site which is a preferred and suitable location for housing being located within the settlement boundary. The Phase 1 land has recently been subject to an outline planning application for up to 37 dwellings (19/31613/OUT). This document demonstrates that the site could be brought forward in conjunction with the Phase 1 land to deliver a comprehensive development package.

Technical Assessments

In preparing the Vision document and Concept Masterplan proposal St Philips have appointed a team of consultants to advise on all matters relating to the promotion of the site. The physical, environmental and technical suitability of the site for residential development has been confirmed by the following assessments, informing the development of the Masterplan:

- » Barton Willmore – Masterplanning and Landscape
- » Phil Jones Associates – Transport and Highways
- » Avison Young – Planning, Flooding, Drainage and Ground
- » FPCR – Ecology and Arboriculture
- » Wardell Armstrong – Heritage and Utilities



-  Site
-  Developed Areas
-  Town Centre
-  Motorway
-  Motorway Junction
-  A Road
-  B Road
-  Railway Line
-  Railway Station
-  Watercourse
-  Waterbody
-  Canal

Wider Site Location Plan

2. Planning Policy Context

The site is located on Greenfield land adjacent to the Settlement Boundary of Eccleshall Village, Staffordshire. The Development Plan currently comprises The Plan for Stafford Borough 2011 – 2031 and The Plan for the Borough Part 2 2011 – 2031. Stafford Borough Council (SBC) adopted their Local Plan on 31 January 2017. This document provides the overarching principles that will deliver the essential development needs of the District up to 2031.

Adopted Local Plan

The Plan sets out the development framework for the District up to 2031. The Plan was adopted on the 19 June 2014, after the publication of the National Planning Policy Framework (NPPF) (2012) and therefore presents the housing requirement for the Borough in line with the guidance provided in the Framework. *Policy SP2 – Stafford Borough Housing and Employment Requirements* sets out a requirement for 10,000 dwellings over the Plan period, equivalent to 500 dwellings per annum. *Policy SP3 – Stafford Borough Sustainable Settlement Hierarchy* outlines that the majority of development will be delivered at the County Town of Stafford and Market Town of Stone before 11 Key Service Villages, including Eccleshall. Spatial Principle 4 deals with housing distribution and allocates 12% of the annual housing target (500 dwellings per year) to the Key Service Villages

The Plan for Stafford Part 2

The Plan for Stafford Part 2 covers the plan period 2011 – 2031. It was adopted by the Council on 31 January 2017 and sets out an approach to development in the sustainable hierarchy. It establishes settlement boundaries for Stafford, Stone and the Key Service Villages, including Eccleshall.

The Inset Map for Eccleshall identifies that the site is located immediately outside the Settlement Boundary and immediately to the north of the Phase 1 site which is located within the Settlement Boundary and is a suitable and preferred location for development. The site is not constrained by any statutory or local conservation designations.

Neighbourhood Development Plan

The Eccleshall Neighbourhood Development Plan (NDP) was adopted in July 2016 and sets out the development framework to 2031. The Plan acknowledges the Borough's commitment to deliver 10,000 dwellings during the Plan period, with 1,200 directed towards the Key Service Villages. Paragraph 6.3 sets out that there are no suitable brownfield sites within the existing boundary of Eccleshall,

therefore, edge of settlement greenfield sites within the Settlement Boundary are considered to be the preferred locations for new housing development, which include the Phase 1 land to the south. As that is also controlled by St Philips, this represents an opportunity to bring forward additional land through a comprehensive approach to site delivery, and an opportunity for site wide masterplanning, access to the River Sow, and the development of a natural boundary for development.

The Eccleshall NDP sets out a list of 5 aspirations which the Parish Council would like to see delivered during the Plan period. Whilst these are not planning policies, the Parish feel the delivery of such community facilities would enhance and preserve the character of Eccleshall village and the wider Parish.

The aspirations included within the Eccleshall NDP include:

- » Road infrastructure around the village or an alternative route for heavy goods vehicles;
- » Improvements to parking facilities within the village;

- » Riverside Country Park area alongside the River Sow;
- » Footpath on Chester Road to Pershall and the Football Club; and
- » Central Reservation and crossing point on Stone Road.

Development of the site for residential uses would be supported by the delivery of a Country Park, thereby fulfilling one of the aspirations contained within the NDP. The site would secure the release of an additional area of land north of the existing allocation at Castle Street and would secure the comprehensive development of land up to the boundary with the River Sow.

Importantly, the site would ensure a permanent buffer to future development pressure and opportunities to deliver a Country Park, which would be offered for public ownership as part of the delivery of policy compliant open space.

Emerging Local Plan

Stafford Borough Council initiated their Local Plan Review in July 2017. Once adopted, this plan will replace the adopted Stafford Borough Part 1 and 2 which cover the plan period 2011 - 2031. The Council undertook a Call for Sites and Local Plan Scoping exercise in September 2018, to which representations and a vision document were submitted. The New Stafford Borough Local Plan 2020-2040 Issues and Options paper was launched for consultation until 21 May 2020.

Strategic Housing & Employment Availability Assessment (SHELAA) 2019 Update

This parcel of land was considered in the 2019 SHELAA Update, Site ID: ECC18. The Council concluded that the area of the site not in the flood zone was developable subject to compliance with Criteria C5 of the Local Plan and Paragraph 71 of the NPPF.

The Council's position was that the site is adjacent to sustainable settlement identified in the adopted Local Plan. Flooding constraints were considered a restriction to development on part of the site, however as this document demonstrates, with appropriate measures it is considered that these constraints can be mitigated.




This document sets out the opportunity that this site presents in light of the technical information which supports its development and promotion through the Stafford Borough Council Local Plan Review.

Five Year Housing Land Supply

The Stafford Borough Plan outlines a requirement for 10,000 dwellings over the Plan period to 2031, equating to 500 dwellings per annum. The latest Five Year Housing Land Supply Statement (2019) shows the position as at 31 March 2019. The report concludes that the Council can currently demonstrate a deliverable housing land supply of 6.83 years. Since the start of the plan period there has been an over-provision against the Plan target of 899 dwellings.





-  Site boundary
-  Phase 1 Site
-  Approximate Settlement Boundary
(Stafford Borough Council, Eccleshall Inset Map 5)

Aerial Site Location Plan

3. Assessing the Context: Local

3.1. Access and Movement

The site is well connected to the surrounding urban area, with easy access to public transport services and strategic highway links. The plan opposite shows the location of the site within the context of the local access and movement network.

Walking and Cycling

The site is well situated with access to the Public Rights of Way (PRoW) Network available via Eccleshall Footpath 12 to the west, and Footpath 6 to the north of the site. A permissive path runs to the north of the River Sow and the northern site boundary, featured in the Eccleshall Parish Council Favourite Walks booklet.

Public Transport

Bus stops are located on Castle Street to the west of the site and offer regular bus services to Stafford and Stone and Hanley, and daily services to Newport and Stoke-on-Trent.

Stone and Stafford rail stations are located 11km north-east and 12km south-east of the site respectively, and offer regular train services to Manchester, Liverpool, Birmingham and London.

Highway Network

The site is located on the eastern side of the A519 (Castle Street), which enters Eccleshall village centre approximately 200m to the south. A footway is provided on the western side of the carriageway.

The M6 Junction 14 is located 8km south-east of Eccleshall providing links to the strategic highway network.



Local bus routes serve Castle Street, adjacent to the sites western boundary.



PRoW Eccleshall 6 Footpath to the north of the River Sow and the site



-  Site
-  Phase 1 Site
-  Developed Areas
-  Local Centre
-  A Road
-  B/ Minor Road
-  Existing Bus Stop
-  Bus Route 14
-  Bus Route 15/ 15A/ 15B
-  PROW: Footpath
-  Woodland
-  Green Space
-  Allotments
-  Watercourse
-  Waterbody

Access and Movement Plan

3.2. Local Facilities

The site is well positioned in terms of access to local facilities and services, as shown on the plan opposite, which includes indicative isochrones of 200m (approximately a 2-minutes' walk)

The site is a short walk to the north of Eccleshall village centre which offers a range of local facilities and services, including food and non-food retail, a GP surgery, a pharmacy and a post office.

Education

The nearest primary school is Bishop Lonsdale C of E Primary School, approximately 1km (a 15-minute walk) to the south-west of the site. Further to this, secondary school bus services are also provided in the vicinity of the site to schools in Stone and Stafford.

Health

The nearest pharmacy and GP surgery are located on Eccleshall High Street, a 130m and 200m walk south east of the site respectively.

Recreation

Formal sports facilities are provided within Eccleshall village; Eccleshall Tennis Club and Cricket Club are located 750m (approximately a 10 minute walk) west of the site.



Eccleshall village hosts many local independent shops



Supermarket in Eccleshall village centre, 180m walk south of the site



- Site
- Phase 1 Site
- Developed Areas
- Local Centre
- A Road
- B/ Minor Road
- Bus Route
- Bus Stops
- PROW: Footpath
- Library
- Doctors
- Dentist
- Pharmacy
- Post Office
- Nursery
- Primary School
- Woodland
- Green Space
- Watercourse
- Waterbody

Local Facilities Plan



View west along Eccleshall High Street.



THE ARCADE
at
12 HIGH STREET

Little Monsters
of Eccleshall
Tel: 01782 231709

katharine house

ECCLESHALL PHARMACY

NHS

3.3. Landscape Character: Key attributes in National and Local Assessments

The landscape character assessment approach is a descriptive approach that seeks to identify and define the distinct character of landscapes that make up the country.

This approach recognises the intrinsic value of all landscapes, not just ‘special’ landscapes, as contributing factors in people’s quality of life, in accordance with the European Landscape Convention. It also ensures that account is taken of the different roles and character of different areas, in accordance with the NPPF Core Principles.

The description of each landscape is used for a basis for evaluation in order to make judgements to guide, for example, development or landscape management.

National Character Area 6r: Shropshire, Cheshire and Staffordshire Plain

Landscape Character Assessment at a National Level of study defines attributes and qualities in the landscape that are discernible at a high level of study. These regional character prompting attributes

are not general but they are broad and wide ranging and include patterns in landform and geology; land use; tree cover; and in settlement. The site and the village of Eccleshall are both located within National Character Area (NCA) 6r: Shropshire, Cheshire and Staffordshire Plain. This NCA covers an extensive area from Chester in the north down to Shrewsbury in the south and comprises of gently undulating, pastoral farmland scattered with large farmsteads, dispersed hamlets, market towns and is crossed by an extensive transport and river network.

The NCA study stops at the settlement edge, where and domestication and the urban nature of the settlement do influence the landscape character. NCA 6r is a strongly rural area however and the scale and depth of the countryside bring clear influences throughout the landscape.

Staffordshire Landscape Character Assessment

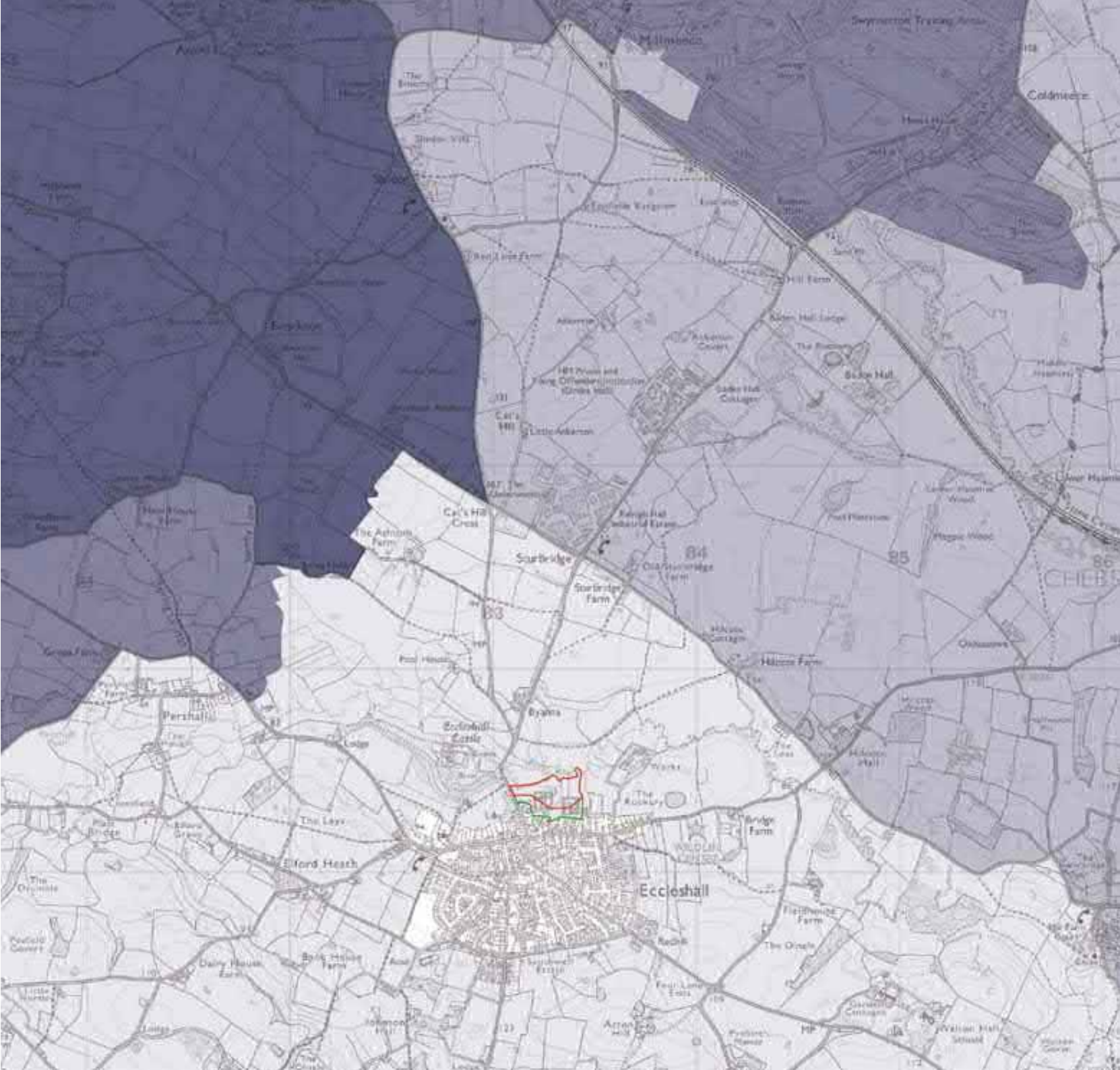
The Staffordshire Landscape Character Assessment (SLCA) adopted in 2001 has looked at landscape character at a more detailed level of study. The SLCA places the site within the ‘Ancient Clay Farmlands’ Landscape Character Type. The LCT is characterised by a mix of arable and pastoral farmland that have an irregular pattern of hedged fields partitioned by ancient hedgerows and oak trees. The mature

hedgerow oaks are characteristic of this landscape and are numerous in places; enough to stand in groups and to coalesce visually, and to interrupt long views across the landscape. In more intensively farmed, predominantly arable areas these intensive farming practices have resulted in the removal of many hedgerows and the fields are larger and the landscape more open.

The gently rolling landform, with occasional high points, frequently allows long distance views over the landscape. Local small scale ancient woodlands and plantations provide areas of denser visual containment.

The SLCA sets specific guidelines for landscape conservation and enhancement within the LCT:

- » “Increase planting of hedgerow trees and field corners to rebuild the structure of the landscape where decline is occurring;
- » Plant new woodlands to adhere to existing field pattern and to reflect the scale of the landscape;
- » Respect the existing broadleaved character of the landscape in any new planting proposals...;
- » Stream corridors could be reinforced with additional linear planting of waterside species.



Staffordshire Landscape Character Assessment.
Landscape Character Type:
'Ancient Clay Farmlands'



View south from Bryanna Farm towards the site and properties on Cherry Tree Close



4. Assessing the Context: The Site

4.1. Access

The eastern side of Castle Street provides a suitable frontage for a new vehicular access.

A review of speed survey data demonstrates that the required visibility for a new access can be achieved in both directions, with visibility splays located wholly within highway land, land within the owners control, or the allocated site.

There are no footways on the eastern side of Castle Street along the site frontage. A footway is provided on the western side of the carriageway opposite the site, and on the eastern side a footway commences approximately 30m south of the site boundary.

A central refuge will be provided on Castle Street to allow pedestrians to cross to the footway on the western side of the carriageway.

The site is only a few minutes walk to the north of the town centre and is served by a regular bus service, it is therefore considered that there is good potential for sustainable travel to and from the site.



View north along the A519 (Castle Street) to the proposed site vehicular access location

4.2. Hydrology and Drainage

Hydrology

The River Sow flows along the northern site boundary. There are two land drains that converge with the River Sow, located along the eastern and north-western site boundaries. A minimum easement of 9m to the river and the land drain will be incorporated into any proposals.

The Environment Agency flood maps show that the majority of the site is shown to fall within Flood Zone 1, although there is an area to the north east of the site which falls within Flood Zone 2 and 3. This area will be left as open space.

The Environment Agency Surface Water Flood Map indicates that there are areas of the site at 'very low' risk (1 in 1,000 year annual chance of flooding) and 'low' risk (between 1 in 1,000 and 1 in 100 years). Surface water from the proposed development will be managed by Sustainable Drainage Systems (SuDS) which will mitigate any risk of surface water flooding.

From a review of the British Geological Survey 'Groundwater Flooding Susceptibility Map' and based on the anticipated geological conditions of the site, there is a potential for groundwater flooding to occur at the surface.

The site is considered to be at 'low' or 'very low' risk of flooding from other sources, such as reservoir, sewer, lakes and canal flooding.

Drainage

Surface water from the proposed development will be drained by a Sustainable Drainage System (SuDS). Considering the impermeable nature of the soil which is predominately underlain by Mercia Mustone, surface water discharge into the ground via infiltration is not considered suitable for this site. Therefore, a positive discharge of surface water from the new SuDS scheme into the River Sow will be required.

Peak discharge rates from the new SuDS scheme will be limited to greenfield rates prior to discharge into the River Sow with surface water attenuation provided within the site for rainfall events up to 1 in 100 years with an allowance for climate change.

Foul water from the proposed development will be drained by a separate foul water drainage system that will be connected to the public foul water sewer located within or close to the southern boundary of the site. The peak foul water discharge rate and the connection point will be agreed with Severn Trent Water.

4.3. Ecology and Biodiversity

A Preliminary Ecological Assessment has been carried out, with subsequent protected species surveys, recommendations and enhancements detailed in the Ecological Appraisal for the site.

Species specific surveys have been undertaken to include great crested newt, badgers, water vole, otters, reptiles and bats. All were absent with bats the only species recorded within the application site. As such, seasonal bat transect and static detector surveys highlighted the boundary hedgerows and trees are used on an occasional basis by the local bat population.

The proposals for the site should offer the scope for habitat creation to be incorporated into the green infrastructure across the site and wider landscape, and allows for the retention of boundary features such as hedgerows and trees. These provide a valuable commuting and foraging resource for local wildlife.

Key habitat features of ecological importance including the River Sow, its tributaries, hedgerows, watercourses and central woodland copse should be retained within the proposals. These areas should be buffered and managed for wildlife, including invertebrates, nesting birds and foraging bats via habitat enhancements and mosaic of grasslands. The retention, enhancement and long-term management of these ecological receptors will minimise the potential effects of proposed development and ensure net gains to biodiversity are provided.

The provision of habitat enhancements along the northern site boundary could increase the overall biodiversity value of the site with enhancement through native species planting, attenuation facilities and species rich meadow grassland replacing current grassland of low ecological value.



View north across the site, towards existing trees along the northern site boundary and the tributary of the River Sow.

4.4. Cultural Heritage

An archaeological and cultural heritage assessment has been undertaken for the site.

The site does not contain any designated heritage assets. It is located approximately 180m east of the Scheduled and Grade II* Listed Eccleshall Castle (1008801 and 1039062). It also lies adjacent to Eccleshall Conservation Area (005), and north-east of the Grade I Listed Church of the Holy Trinity (1180335) which is located within Eccleshall. The

proposals should consider the sites proximity to these assets, and ensure that their settings are respected.

Development should be set back from Castle Street, thereby preserving its rural character. Consideration should also be given to locating development to the south of the site, in the context of the existing housing, allocated site and concealing development from Eccleshall Castle as well as the majority of the Eccleshall Conservation Area.

Views from the west of the site, towards the tower of the Church of the Holy Trinity should be considered, and could contribute to the development's sense of place and provide linkages to the historic environment.



View south from PRoW Eccleshall 6 footpath across the River Sow, towards the site and Eccleshall village.

4.5. Utilities

A full utilities search has been conducted to identify any existing services across the site.

The search identified a number of constraints within the site, detailed below and shown on the plan opposite:

Gas

- » Cadent Gas – formerly known as National Grid, records show an 8 inch, steel, medium pressure (MP) gas main apparatus bisecting the middle part of the site, running in a south/north orientation. The MP gas main is connected to a gas governor located south of the site outside of the site boundary. This converts the MP gas main to a 250mm Polyethylene (PE) which then supplies the residential area immediately south of the site.

Electricity

- » Western Power Distribution (WPD) has an underground low voltage electricity cable running along A519 Castle Street to the west of the site and continues to enter a small section of the proposed pedestrian access to the site from the A519.

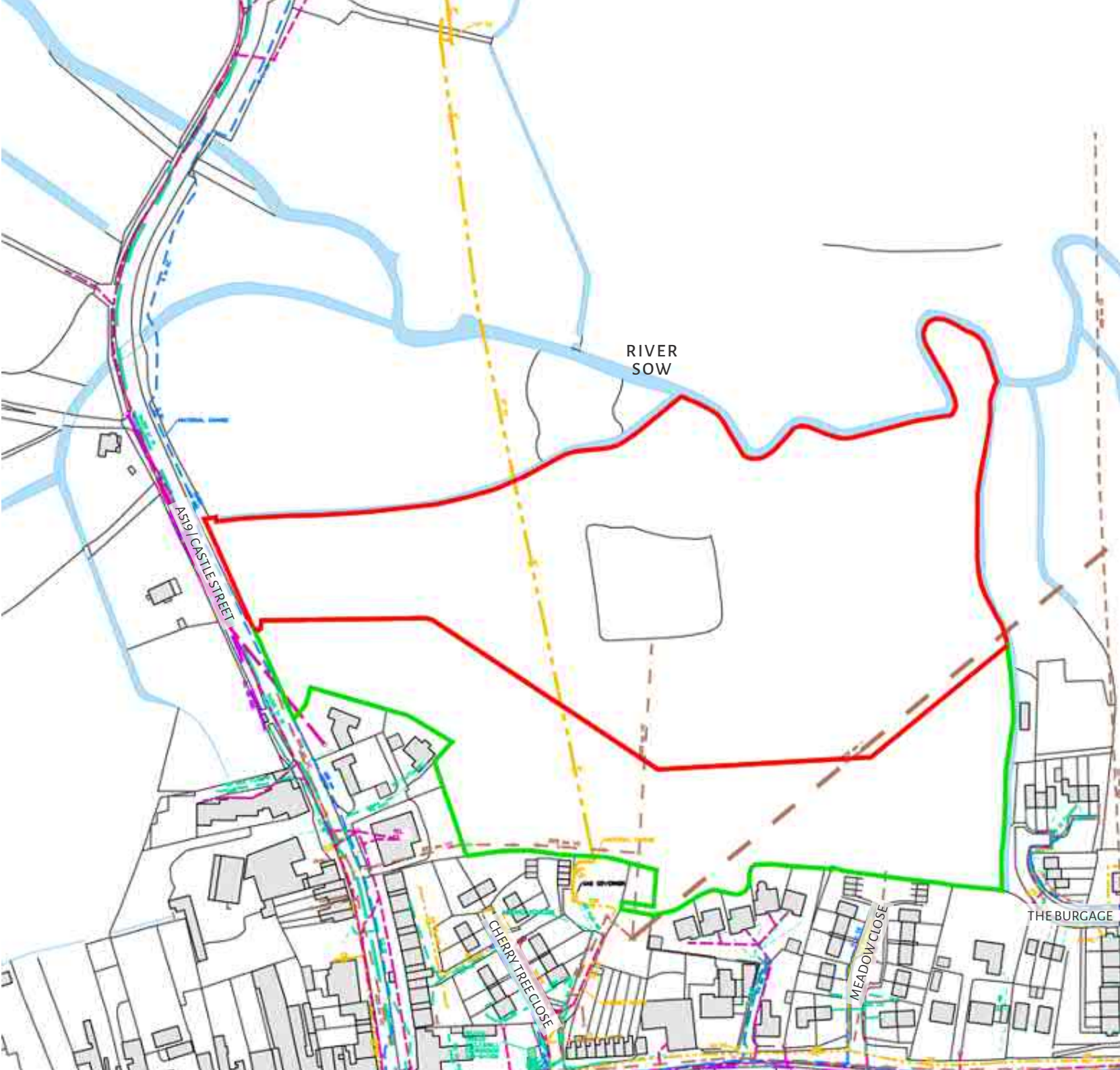
Potable Water

- » Severn Trent Water (STW) records show a 180mm potable water main crossing a small part of the proposed pedestrian access and carry on running along the A519 Castle Street, adjacent to the site boundary.
- » The records also show the water mains change in size to 6 inch and continues to run along the inner part of the top western corner of the site.

Sewerage

- » Severn Trent Water (STW) records show 225mm public foul gravity sewers running along the southern boundary within the site and then moves south to a pumping facility located outside of the site boundary.
- » STW records also show 150 mm public surface water gravity sewer, running along Meadow Close to the south of the site and enters a small section of the site boundary.
- » The records also show another 225mm public foul gravity sewer pipe running from the middle of the site, south towards the pumping facility.
- » Further assessment of STW records show a 375mm pressurised public foul sewer main, running from the pumping facility and bisecting the site in a north easterly orientation.

The capacity requirements and new service connections associated with the proposed site will be calculated, and are subject to formal approval from the appropriate service provider.



- Site boundary
- Phase 1 Site
- WPD LV overhead cable
- WPD LV pole
- WPD 11kV underground cable
- WPD LV underground cable
- Electrical sub-station
- Cadent Gas medium pressure gas pipe
- Cadent Gas low pressure gas pipe
- Cadent Gas cap end
- Gas governor
- STW potable water main
- STW water valve
- STW public surface water gravity sewer
- STW public surface water manhole
- STW public foul gravity sewer
- STW public foul pressurised sewer
- STW combined use manhole
- STW pumping facility
- BT overhead cable
- BT underground cable
- BT pole
- BT manhole
- BT cabinet
- BT jointbox

Existing Utilities Plan

4.6. Arboriculture

An Arboricultural Assessment has been carried out in accordance with guidance contained within British Standard 5837:2012 'Trees in Relation to Design, Demolition and Construction - Recommendations'.

The guidelines set out a structured assessment methodology to assist in determining which trees would be deemed either as being suitable or unsuitable for retention along with recommendations for considering the relationship between existing trees and how those trees may integrate into designs for development.

In summary, the report concludes:

- » The site comprises a single parcel of open grassland with extensive boundary tree cover and wooded areas.
- » Species present were predominately Sycamore and Willow which range from semi mature to mature proportions.

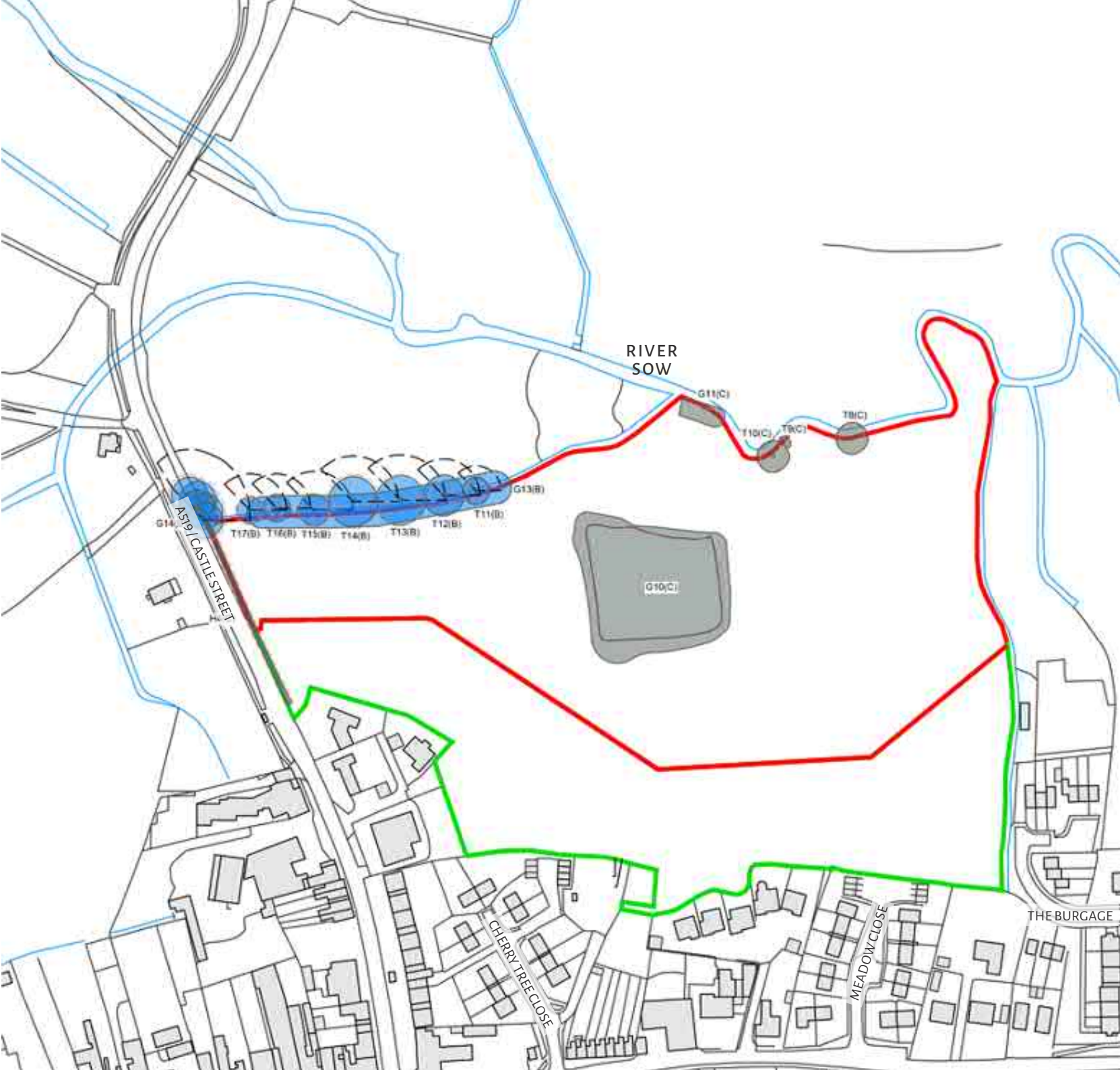
- » A mixture of other species was found with Ash, Elder and Hawthorn being dominant throughout the site.

Tree cover to the north was the most established with a linear feature consisting of sycamore trees and an established group of mixed species. A group of early mature and mature trees positioned centrally to the site also provided a key landscape feature, although the quality of the material present was considered to be low.

General condition of trees was considered to be fair, and therefore recorded as either moderate or low in arboricultural quality.

Across the site a total of ten individual trees, four tree groups and one hedgerow were surveyed as part of the Arboricultural Assessment. There were no specimens considered to be high in quality and category A. Nine areas were recorded as moderate quality and Category B, and the remaining six trees, groups of trees and hedgerow were recorded as low in quality and Category C.

The vast majority of tree cover is to be retained due to its northern position within the application boundary. Residential parcels are to be restricted to the southern extent of the application boundary adjacent to the main access road. New tree planting is to be provided across extensive areas of green open space and therefore the proposals should be considered an opportunity, in the terms of arboriculture, to improve and increase tree cover in the local area without the loss of any arboriculturally significant trees.



- Site boundary
- Phase 1 Site
- Category B Tree/ Hedgerow Planting
- Category C Tree/ Hedgerow Planting
- Root Protection Area (altered where appropriate to reflect underground constraints)
- Indicative Shade Pattern (in accordance with BS5821:2012 where appropriate)

4.7. Landscape and Visual Baselines

The site sits at the edge of the countryside; this is a rural transition landscape where subtle changes occur over short distances and where the village, within its built environment and the attributes of concentrated habitation also exert influences.

Comprised of pastoral farmland with a central mature woodland copse, the landform slopes very gently towards the River Sow. In terms of the landscape attributes associated with the site, it has well defined and strong, clearly identifiable boundaries. The buildings in the village beyond the southern site boundary, sit at a similar level to the site. Further into Eccleshall and south from Stone Road, the land rises, elevating the built environment of the village onto high ground along the Stafford Road. Beyond the southern boundary both physical and visual enclosure is formed by late twentieth century houses and maisonettes, their back gardens softened by mature trees, woodland and hedgerows.

The line of Castle Street (A519) defines the western side of the site, a managed hedgerow of native species lines much of its length. A substantial area of mature trees line the adjacent side of the road adding further containment. The northern boundary has two distinct areas. On the western extent, the boundary is made by a small tributary watercourse of the River Sow. This is reinforced by tall Sycamore trees that run along and enclose the northern edge in this area. The eastern extent of this northern boundary is formed by the River Sow has fewer trees and is visually open. The river meanders severely in this area, its convoluted path is demarcated by distinctive riparian vegetation.

The landform plays an important role in the character of the site. Although the site itself near flat there is a more distinctive change in landform to the north as ground rises to form a pronounced mould. This gently rolling landform is identified to be located outside of the site and is a key characteristic of the 'Ancient Clay Farmlands' Landscape Character Type. The site sits comparatively low in relation to this and is visually discrete. This is enhanced by existing tree cover because of the landform, the tree cover and the placement of the settlement.



- Site
- Phase 1 site
- Landscape Elements**
- Settlement
- Main road
- River Sow
- Public Right of Way (Footpath 6)
- Landscape Character: Ancient Clay Farmlands
- Landscape Baseline: Vegetation on Site**
- Woodland copses and vegetation groups
- Mature hedgerows and field trees
- Mature hedgerows
- Low hedgerows
- Landscape Baseline: Landform**
- Countours and landform
- Visual Baseline**
- Key viewline
- Clear/open viewline
- Filtered/partial viewline
- Restricted viewline
- Boundary Edge Characteristics**
- Southern edge: Residential properties
- Northern edge: River Sow
- Western edge: Castle Street
- North western edge: Woodland
- Western edge: Agricultural Land

Landscape and Visual Baselines Plan



View from PRow (Eccleshall 6 footpath) south-west across the site, to the rear of properties on The Burgage and Southlands Court.



4.8. Summary of Opportunities and Constraints

The findings of site and context analysis have been evaluated to identify the key opportunities and constraints to the development of the site.

A summary of these findings is set out here:

Land Use

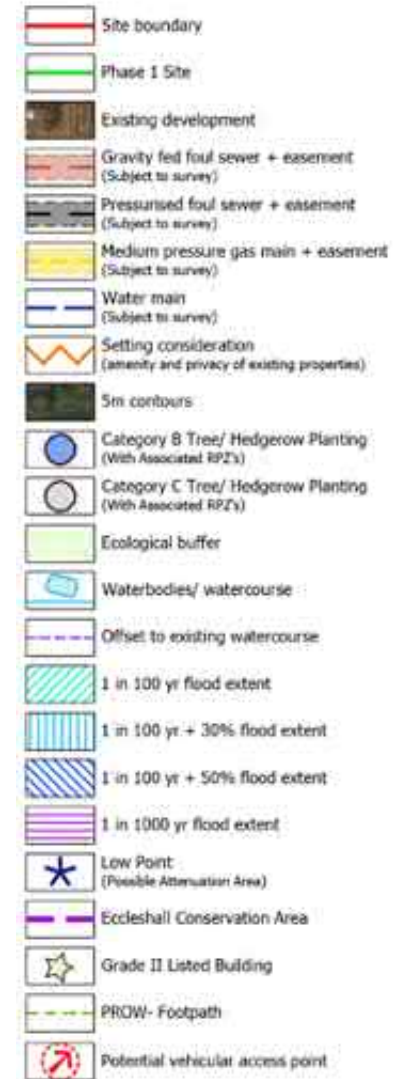
- » Development of the site provides a natural extension to the town and will utilise the River Sow as a firm physical boundary to growth.
- » The development proposals will consider the location of existing properties adjoining the site, and ensure that the privacy and amenity of these properties is respected.
- » The proposals will follow best practice urban design principles, and will be structured to form a legible and permeable development.
- » Opportunity to provide areas of amenity open space and formal play facilities that encourage social interaction and community use.

Access and Movement

- » Vehicular access will be taken from A519 (Castle Street) to the south west of the site.
- » There is the potential for a countryside green link to be provided along the northern site boundary across the River Sow, connecting the site to the PRoW network (subject to future discussions).

Ecology and Biodiversity

- » The majority of the site comprises semi-improved grassland of low ecological value.
- » The habitats of ecological importance within the site will be retained and buffered to maintain wildlife corridors, and to continue to provide foraging opportunities for species such as bats.
- » It is recommended that a variety of bat and bird boxes be provided on the retained trees and new buildings within the overall scheme, to enhance roosting and nesting opportunities.





RIVER SOW

A519/CASTLE STREET

CHERRY TREE CLOSE

MEADOW CLOSE

THE BURAGE

Flooding and Drainage

- » The River Sow is located along the northern boundary of the site.
- » A minimum easement of 8m from the river bank will be required.
- » Flood modelling exercise has shown a reduction in the land at flood risk.
- » New flood maps show the majority of the site to fall within Flood Zone 1.
- » Development will be directed away from areas of flood risk.
- » The development will consider the use of Sustainable Drainage Systems (SuDs) to accommodate and manage surface water drainage.

Heritage and Archaeology

- » The location and setting of the Eccleshall Conservation Area will be respected within the proposals.
- » Buffer to be provided to the north of the site to Eccleshall Castle (Scheduled Ancient Monument and Grade II* Listed).

Landscape and Landform

- » Enhance Green Infrastructure of the site in line with landscape strategy for the Ancient Clay Farmlands LCT rebuilding the structure of the landscape through the re-planting of hedgerow trees;
- » Opportunities should be taken to retain and reinforce areas of mature trees ensuring the existing broadleaved character is respected;
- » The incorporation of marginal shrub planting around the areas of attenuation to increase biodiversity; and
- » To enhance, define and create a unified character along the new settlement edge.

Utilities

- » Appropriate easement for the identified utilities will be integrated into the masterplan proposals.
- » The capacity requirements and new service connections associated with the proposed site will be calculated and appropriate infrastructure provided for the future development.



30

ECCLESHALL
Please drive carefully

BEER GIN CIDER
BEER
FESTIVAL
FRI JUNE 16TH 12-12
SAT JUNE 17TH 12-12
SCOUT HQ
WELCOME

View south-east along the A519 (Castle Street) towards the proposed site access

5. Design Principles

5.1. Concept Masterplan

The concept masterplan for the site (presented opposite) shows how the proposals for Castle Street have been informed by the Vision and initial site analysis presented earlier in this document.

The plan seeks to ensure that the scheme will offer a high-quality place to live that is responsive to the sites setting, and has also been guided by the following design principles:

- » Provision of up to 30 new dwellings.
- » Vehicular access will be taken from the A519 (Castle Street) via a new priority T-junction, serving the allocated site.
- » Potential for a new car park serving Eccleshall, alleviating congestion in the centre of the village.
- » Development has been shaped by existing green capital within the site, and existing tree and hedgerow planting has been retained wherever possible.
- » Development will be structured to ensure the creation of a permeable and legible place, with streets and spaces overlooked by active frontages wherever possible, encouraging natural surveillance and safety.
- » Development will front onto the development in the south of the site, and back onto the eastern site boundary, respecting the amenity and privacy of existing and proposed dwellings.
- » Easements for the utilities crossing the site have been accommodated within the proposals allowing future access for service providers.
- » Informal pedestrian routes through the site, providing the opportunity for a circulatory walk, promoting healthy lifestyle choices.
- » Open space will be orientated and located to make the best use of existing landscape assets.
- » Provision of new formal play facilities, benefitting both the existing and proposed community.



WALK 8
ROUTE

RIVER
SOW

A519 / CASTLE STREET

ECCLESHALL
12 FOOTPATH

NEW RESIDENTIAL
DEVELOPMENT

CHERRY TREE CLOSE

MEADOW CLOSE

THE BURGAGE



5.2. Landscape Strategy

The residential development will be set in a new landscape of wildflower meadow grassland and parkland trees, all created for public access and enjoyment. The character of the landscape will form a strong prompt in the creation of this new public parkland.

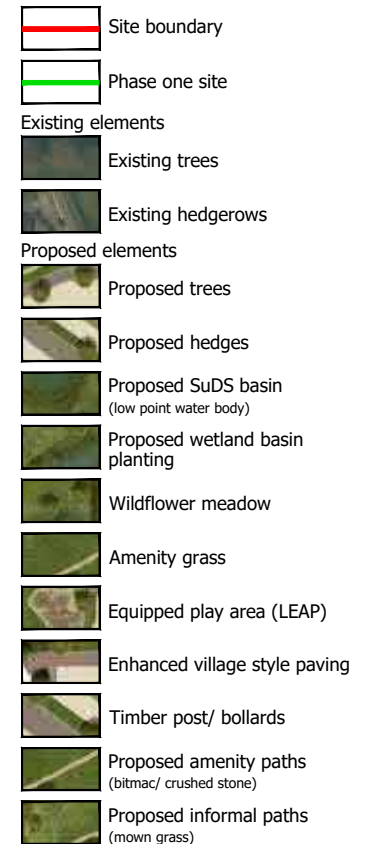
The intention is to set the residential use within a publicly accessible riverside park. This strategy is a response to the setting of the site and to the nature and character of the spaces along the northern boundary – the longest boundary with the countryside. The parkland will have a naturalistic planting pattern of new waterside trees that are typical of the meadows along the River Sow in Eccleshall.

New native hedges are proposed around the majority of the drives, lanes and streets that run at the edge of the houses and homes. This public realm boundary treatment is relevant to the place and will form an effective physical barrier as well as a visual filter that will be attractive and have a biodiversity value.

Play provision is anticipated to be an important component of the new public parkland. A formal play space is shown on the proposals and will, like much of the detail of the development be refined and enhanced as the proposals progress. The opportunity for a circular exercise trail is clear. So too is a play strategy that promotes ‘natural play’ with reference to: water meadows and the enjoyment of the more natural aspects of wildlife as well as the seasonal changes throughout the year.

The landscape strategy for the public park is not separate to the residential scheme. The landscape and proposed homes form an integrated design proposal. The landscape and visual analysis has been applied and has influenced the early concepts for the masterplan. The objective is to craft a scheme that has a responsibility to make an attractive addition to the village, as well as creating a new edge to the village.

The connectivity between the proposed residential dwellings and the parkland will be made via new public paths which will allow access to the new parkland within the site and the wider landscape to the north. Overall it is a unified and holistic proposal that ensures the whole scheme has a strong sense of place and a responsibility to its setting through a sympathetic and informed design strategy.



Illustrative Landscape Strategy Plan

WALK 8
ROUTE

RIVER
SOW

ECCLESHALL
12 FOOTPATH

A59 / CASTLE STREET



6. Summary of Aspirations

Our proposals for Castle Street, Eccleshall have been informed by the vision and initial site analysis presented within this vision document.

Overall the key benefits of development at Castle Street are:

- » Provision of an attractive and high quality residential development that retains existing landscape assets within the site.
- » Development in a sustainable and accessible location that maximises proximity to local facilities in Eccleshall village.
- » Residential development with multi-functional green infrastructure, amenity open space and ecological habitat creation that provides areas for recreation and formal play, bringing benefits to the new and existing community.
- » Potential to significantly enhance the setting of the River Sow through the creation of a new Country Park.
- » Provision of an accessible development, with the potential to enhance pedestrian connectivity to the Public Rights of Way network beyond the site.





View west along Eccleshall High Street with Grade I Listed Church of the Holy Trinity in background.

Appendix II

Representations to Settlement Assessment (July 2018)



Our Ref: 01B709302/kg

18 September 2018

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



gva.co.uk

Dear Sirs

STAFFORD BOROUGH COUNCIL – NEW LOCAL PLAN: SETTLEMENT ASSESSMENT AND SETTLEMENT PROFILES CONSULTATION

GVA have been instructed on behalf of our clients, St Philips, hereafter referred to as “the Developers”, to make representations to the Stafford Borough Council (“the Council”/“SBC”) on the New Local Plan: Settlement Assessment and Settlement Profiles consultation.

We thank the Council for the opportunity to be consulted on the emerging Local Plan and set out in this letter our response to the proposed methodology for determining the revised Settlement Hierarchy and Settlement Profiles.

These representations are made in support of our client’s site, Land east of Castle Street, Eccleshall and are accompanied by a Strategic Vision Document (“Vision Document”) and Illustrative Concept Masterplan. The Developer also controls the land to the south of the proposed development site, where a hybrid planning application is being prepared comprising 60 residential dwellings, associated infrastructure and open space. Thus, the proposed development site has been masterplanned comprehensively to fully realise the sites opportunities.

Site Background and Context

The site comprises a single field parcel with a copse of trees located centrally. The site is bound by a tributary to the River Sow to the north; existing agricultural and existing development to the east; settlement boundary to the south; and Castle Street to the west.

The proposed masterplan indicates how the scheme comprehensively responds to the proposed development within the settlement boundary to the south and has the potential to deliver one of the Parish Council’s Neighbourhood Development Plan aspirations, that being, a Country Park and riverside walk.

The total developable area proposed within the masterplan equates to 0.89 ha of the overall site area, thus delivering up to 20 residential dwellings. The site affords opportunities for the scheme to be landscape-led ensuring

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the protection and enhancement of the existing rural edge of the settlement and heritage assets.

Representations to New Local Plan: Settlement Assessment and Settlement Profiles

We set out below our comments with regard to the Council's proposed methodology for establishing a revised Settlement Hierarchy and Settlement Profiles and respond accordingly to those elements the Developers feel are necessary to ensure the new Local Plan is positively prepared, justified, effective and consistent with national planning policy.

Planning Policy Context

Whilst St Philips is in full support that the preparation of the methodology and subsequent hierarchy should be undertaken in the context of the National Planning Policy Framework, they consider that the overall approach, outlined under Section 2: Planning Policy Context (page 3-4), should be underpinned against the revised policy context established in the Revised National Planning Policy Framework, which was published in July 2018.

As a result, the following changes should be reflected in this section of the methodology and their impact fully reviewed by the Council:

National Planning Policy Framework 2012	National Planning Policy Framework 2018	Key Theme
Paragraph 28	Paragraph 83	Relating to the influence planning policies can have on the prosperity of rural economies.
Paragraph 17	Paragraph 104	Planning should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycle, and focus development in locations which are, or can be made, sustainable.
Paragraph 38	Paragraph 104	Large scale developments should be located in close proximity to key facilities including primary schools and local shops.
Paragraph 55	Paragraph 78	Housing in rural areas should be located where it will enhance or maintain the vitality of rural communities.
Paragraph 70	Paragraph 92	Planning policies should ensure an integrated approach to considering the location of housing, economic uses and community facilities.

The review of the methodology against the Revised National Planning Policy Framework is fundamental to ensuring the Council have a robust evidence base and a new Local Plan that is positively prepared and consistent with national planning policies.

Methodology – Categories for Assessment

Key Facilities

St Philips agrees, in principle with the assessment criteria 'Key Facilities' outlined on pages 7 - 9, however, believes it is incumbent on the Council to update the methodology in line with Paragraph 80 of the Revised NPPF. Community Facilities are subsequently named as "local shops, meeting places, sports venues, open space, cultural buildings, public house and places of worship."

In addition to the above the guidance stated in Table 2: NPPF Guidance on sustainability and community facilities will need to be reviewed.

The Settlement Hierarchy

St Philips have reviewed the proposed Settlement Hierarchy detailed on pages 11 and 12, and agree, in principle, with the way in which development will be directed. Notwithstanding this position, the Developers wish to object to the status of Eccleshall within Settlement Hierarchy due to the role the settlement plays within the Borough. The settlements key role is demonstrated within the consultation document with regard to its size in terms of population and total number of households, accessibility to employment and accessibility to shops, facilities and amenities, together with the role the settlement plays for smaller villages as a larger centre.

It is therefore recommended that the status of Eccleshall should be elevated. This is recognised in paragraph 4.14 of the consultation document (New Local Plan Settlement Assessment) where parallels are drawn between itself, Stone, Stafford and the North Staffordshire Urban Area due to the *'range of retail, employment, education and community services, also referred to as the 'main settlements'*.

In this respect, our client suggests that another category be added to the hierarchy, 'Market Towns', which sits at the same level as the North Staffordshire Urban Areas. This would ensure that the right level of growth proportionate to the settlements size and scale will be reflected within emerging policies.

In addition, our client is of the opinion that the term 'Large Villages' does not accurately reflect the scope of the settlements earmarked under that category. For example, Eccleshall is a market town of 1,541 dwellings in comparison to Barlaston which contains almost half; 756 dwellings. It is therefore considered that by creating a market towns category, larger settlements such as Eccleshall can be reflected appropriately.

Notwithstanding this, it is recognised that to accommodate growth within Eccleshall adjustments to the settlement boundary will need to be made. This should be done in locations where it is clearly justifiable and where defensible boundaries can be drawn, ensuring encroachment into the countryside is minimised. Thus, it is considered that the proposed development site, located adjacent to the northern boundary of Eccleshall should be considered as an appropriate location for development within the new Local Plan as it is bound by a tributary to the River Sow to the north, agricultural land and existing development to the east, the settlement boundary to the south and Castle Street to the west. Future development in this location would therefore be restricted, thus preserving the rural edge to the settlement and further growth.

The Strategic Vision Document submitted in support of these representations demonstrates the merits of the site in terms of its sustainability, achievability, deliverability and suitability.

If the Council feel that it is inappropriate to do this, we would recommend any future policy wording recognise the differentiation between the variety of settlements under 'Large Villages' and direct growth accordingly.

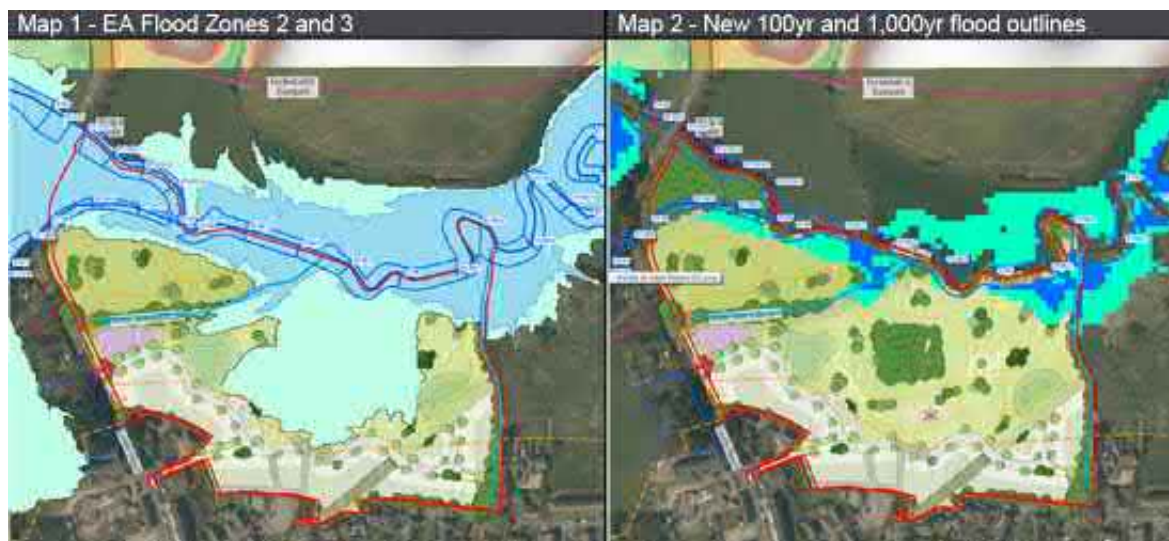
Appendix B – Settlement Assessment

We have undertaken a review of the settlement proforma as detailed in Appendix B (pages 29 – 30) of the methodology and note that the 'Eccleshall Environmental Constraints Map' does not take into consideration the results of a recent hydraulic modelling exercise undertaken by St Philips.

This exercise included remodelling this section of the watercourse located to the north of Eccleshall and subsequently the site boundary using the latest two dimensional flood software, channel surveys and topographical data to provide a more accurate flood outline.

As demonstrated in Figure 1, below, this shows a significant reduction of land located within the flood risk area.

Figure 1



This was submitted to the Environment Agency who appointed an approved consultant (Mott McDonalds) to review the new flood model. As a result, Mott McDonald confirmed their acceptance of the new model in December 2017.

Subsequently, the Environment Agency's Area Modeller agreed with the conclusions reached by Mott McDonald and confirmed that the public flood map, available online, would be updated by the end of 2018. Should an interim flood map for planning purposes be required, one can be requested from the West Midlands Environment Agency Team.

It is therefore concluded that the 'Environmental Constraints Map' provided on page 29 which subsequently informs the 'Eccleshall Settlement Assessment' on page 30 should be updated to reflect the latest flood risk position. In addition, the 'Physical Characteristics' table should be updated accordingly.

Conclusions

As demonstrated within this letter, St Philips support the proposed Settlement Hierarchy and Settlement Profiles, in principles. However, recommend the following changes be made to ensure the methodology is prepared positively to support the new Local Plan:

- Review the methodology against the Revised National Planning Policy Framework, as published in July 2018 (pages 3-4 and 7-9)
- Review Eccleshall's status within the Settlement Hierarchy (pages 11-12):
 - Additional category to reflect the nature of the settlement, that being a Market Town; or
 - Ensure emerging policy wording reflects the size and scale of Eccleshall as a settlement and direct growth to this location in the first instance before other 'large villages' comprising a lesser total of households.
- Review the 'Eccleshall Environmental Constraints Map' and 'Physical Characteristics' table in light of the Developers recent hydraulic modelling exercise (pages 29 – 30).

St Philips wish to emphasise support for the new Local Plan and subsequently, the opportunity to continue dialogue with the Council during the plan preparation process to ensure the full potential of the proposed development site is realised in respect of housing delivery and growth across the Borough of Stafford within the emerging Local Plan.

Should you require any further information with regard to the representations being made, please do not hesitate to contact myself or my colleague Kate Green ([REDACTED])
[REDACTED]

Yours faithfully

[REDACTED]

Jon Kirby
Senior Director

[REDACTED]

For and on behalf of GVA Grimley Limited

Encl.

Contact Details

Enquiries

Nick Hardy

[Redacted]
[Redacted]

Visit us online

avisonyoung.co.uk

**New Stafford Borough Local Plan 2020-2040
 “Issues and Options” Consultation - Response Form**

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent’s Details (if applicable)
Title		Miss
First Name		Stephanie
Surname		Eastwood
E-mail address		
Job title (if applicable)		Associate Director
Organisation (if applicable)	Taylor Wimpey North Midlands	Avison Young
Address		
Postcode		
Telephone Number		

Thank you for taking the time to provide your comments on the “Issues and Options” document for the Stafford Borough Local Plan 2020-2040. All comments will be considered when preparing the Preferred Options for the New Local Plan.

Please return this form either by email (preferred) to: forwardplanning@staffordbc.gov.uk

or by post to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ

Please ensure receipt by Stafford Borough Council **by 12.00 noon Tuesday 31 March 2020.**

For advice on how to respond to the consultation and how to fill in this form, please see the Consultation Guidance Notes on the Council’s website at: www.staffordbc.gov.uk/new-local-plan or call 07800 619636 / 07800 619650.

Please note:

- Comments must be received by 12noon on Tuesday 31 March 2020. Late comments will be considered “not duly made” under the Regulations;

- Please fill in a separate Part B for each question/paragraph/table/topic you are commenting on and, where necessary, please explain your response;
- Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.

Part B: Your Comments				
<i>Please complete a new Part B for each representation you wish to make.</i>				
Name -		Organisation Taylor Wimpey North Midlands		
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?				
Section		Paragraph		Table
Figure		Question	1A	Other
2. Please set out your comments below				
<p>Please see separate representation document for detailed response.</p>				

Part B: Your Comments				
<i>Please complete a new Part B for each representation you wish to make.</i>				
Name -		Organisation Taylor Wimpey North Midlands		
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?				
Section		Paragraph		Table
Figure		Question	1B	Other
2. Please set out your comments below				
<p>Please see separate representation document for detailed response.</p>				

Part B: Your Comments

<i>Please complete a new Part B for each representation you wish to make.</i>					
Name -		Organisation Taylor Wimpey North Midlands			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	3A	Other	
2. Please set out your comments below					
<p>Please see separate representation document for detailed response.</p>					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name -		Organisation Taylor Wimpey North Midlands			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	3B	Other	
2. Please set out your comments below					
<p>Please see separate representation document for detailed response.</p>					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name -		Organisation Taylor Wimpey North Midlands			
2. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	3C	Other	

2. Please set out your comments below

Please see separate representation document for detailed response.

Part B: Your Comments

Please complete a new Part B for each representation you wish to make.

Name - Organisation Taylor Wimpey North Midlands

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?

Section		Paragraph		Table	
Figure		Question	3D	Other	

2. Please set out your comments below

Please see separate representation document for detailed response.

Part B: Your Comments

Please complete a new Part B for each representation you wish to make.

Name - Organisation Taylor Wimpey North Midlands

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?

Section		Paragraph		Table	
Figure		Question	3F	Other	

2. Please set out your comments below

Please see separate representation document for detailed response.

Part B: Your Comments

Please complete a new Part B for each representation you wish to make.

Name - Organisation Taylor Wimpey North Midlands

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?

Section		Paragraph		Table	
Figure		Question	4A	Other	

2. Please set out your comments below

Please see separate representation document for detailed response.

Part B: Your Comments

Please complete a new Part B for each representation you wish to make.

Name - Organisation Taylor Wimpey North Midlands

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?

Section		Paragraph		Table	
Figure		Question	4E	Other	

2. Please set out your comments below

Please see separate representation document for detailed response.

Part B: Your Comments

Please complete a new Part B for each representation you wish to make.

Name - Organisation Taylor Wimpey North Midlands

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?

Section		Paragraph		Table	
Figure		Question	5A	Other	

2. Please set out your comments below

Please see separate representation document for detailed response.

Part B: Your Comments

Please complete a new Part B for each representation you wish to make.

Name - Organisation Taylor Wimpey North Midlands

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?

Section		Paragraph		Table	
Figure		Question	5B	Other	

2. Please set out your comments below

Please see separate representation document for detailed response.

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Part B: Your Comments				
<i>Please complete a new Part B for each representation you wish to make.</i>				
Name -		Organisation Taylor Wimpey North Midlands		
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?				
Section		Paragraph		Table
Figure		Question	5C	Other
2. Please set out your comments below				
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Name -		Organisation Taylor Wimpey North Midlands		
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?				
Section		Paragraph		Table
Figure		Question	5D	Other
2. Please set out your comments below				
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Name -		Organisation Taylor Wimpey North Midlands		
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?				
Section		Paragraph		Table
Figure		Question	5F	Other
2. Please set out your comments below				
<p>Please see separate representation document for detailed response.</p>				

Part B: Your Comments				
<i>Please complete a new Part B for each representation you wish to make.</i>				
Name -		Organisation Taylor Wimpey North Midlands		
2. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?				
Section		Paragraph		Table
Figure		Question	5G	Other
2. Please set out your comments below				
<p>Please see separate representation document for detailed response.</p>				

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Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name -		Organisation Taylor Wimpey North Midlands			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	5H	Other	
2. Please set out your comments below					
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Part B: Your Comments					
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Name -		Organisation Taylor Wimpey North Midlands			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	5I	Other	
2. Please set out your comments below					
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Part B: Your Comments					
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Name -		Organisation Taylor Wimpey North Midlands			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	5J	Other	
2. Please set out your comments below					
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Part B: Your Comments					
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Name -		Organisation Taylor Wimpey North Midlands			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	5Q	Other	
2. Please set out your comments below					
<p>Please see separate representation document for detailed response.</p>					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name -		Organisation Taylor Wimpey North Midlands			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	

Figure		Question	8A	Other	
2. Please set out your comments below					
<p>Please see separate representation document for detailed response.</p>					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name -		Organisation Taylor Wimpey North Midlands			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	8B	Other	
2. Please set out your comments below					
<p>Please see separate representation document for detailed response.</p>					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name -		Organisation Taylor Wimpey North Midlands			
2. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	8C	Other	
2. Please set out your comments below					

Please see separate representation document for detailed response.

Part B: Your Comments

Please complete a new Part B for each representation you wish to make.

Name - Organisation Taylor Wimpey North Midlands

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?

Section		Paragraph		Table	
Figure		Question	8E	Other	

2. Please set out your comments below

Please see separate representation document for detailed response.

Part B: Your Comments

Please complete a new Part B for each representation you wish to make.

Name - Organisation Taylor Wimpey North Midlands

2. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?

Section		Paragraph		Table	
Figure		Question	8F	Other	

2. Please set out your comments below

Please see separate representation document for detailed response.

Part B: Your Comments

Please complete a new Part B for each representation you wish to make.

Name - Organisation Taylor Wimpey North Midlands

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?

Section		Paragraph		Table	
Figure		Question	8H	Other	

2. Please set out your comments below

Please see separate representation document for detailed response.

Part B: Your Comments

Please complete a new Part B for each representation you wish to make.

Name - Organisation Taylor Wimpey North Midlands

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?

Section		Paragraph		Table	
Figure		Question	8K	Other	

2. Please set out your comments below

Please see separate representation document for detailed response.

Part B: Your Comments

Please complete a new Part B for each representation you wish to make.

Name - Organisation Taylor Wimpey North Midlands

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?

Section		Paragraph		Table	
Figure		Question	8N	Other	

2. Please set out your comments below

Please see separate representation document for detailed response.

Part B: Your Comments

Please complete a new Part B for each representation you wish to make.

Name - Organisation Taylor Wimpey North Midlands

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?

Section		Paragraph		Table	
Figure		Question	9C	Other	

2. Please set out your comments below

Please see separate representation document for detailed response.

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Name -		Organisation Taylor Wimpey North Midlands			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	9E	Other	
2. Please set out your comments below					
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1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	9F	Other	
2. Please set out your comments below					
<p>Please see separate representation document for detailed response.</p>					

Part B: Your Comments					
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Name -		Organisation Taylor Wimpey North Midlands			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	9G	Other	
2. Please set out your comments below					
<p>Please see separate representation document for detailed response.</p>					

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Section		Paragraph		Table	
Figure		Question	9I	Other	
2. Please set out your comments below					
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1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	

Figure		Question	9J	Other	
2. Please set out your comments below					
<p>Please see separate representation document for detailed response.</p>					

Part B: Your Comments					
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1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	9L	Other	
2. Please set out your comments below					
<p>Please see separate representation document for detailed response.</p>					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name -		Organisation Taylor Wimpey North Midlands			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	10A	Other	
2. Please set out your comments below					

Please see separate representation document for detailed response.

Part B: Your Comments

Please complete a new Part B for each representation you wish to make.

Name - Organisation Taylor Wimpey North Midlands

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?

Section		Paragraph		Table	
Figure		Question	12A	Other	

2. Please set out your comments below

Please see separate representation document for detailed response.

Part B: Your Comments

Please complete a new Part B for each representation you wish to make.

Name - Organisation Taylor Wimpey North Midlands

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?

Section		Paragraph		Table	
Figure		Question	12B	Other	

2. Please set out your comments below

Please see separate representation document for detailed response.

Part B: Your Comments

Please complete a new Part B for each representation you wish to make.

Name - Organisation Taylor Wimpey North Midlands

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?

Section		Paragraph		Table	
Figure		Question	12D	Other	

2. Please set out your comments below

Please see separate representation document for detailed response.

Please use a continuation sheet if necessary

All comments should be made in writing preferably using this form and should be received by Stafford Borough Council **no later than 12 noon Tuesday 31 March 2020.**

You can view the documents online at www.staffordbc.gov.uk/new-local-plan-

Please e-mail your comments (Preferred) to: forwardplanning@staffordbc.gov.uk

or post your comments to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ

Thank you for taking the time to contribute to this consultation.

NEW LOCAL PLAN 2020-2040: ISSUES & OPTIONS
STAFFORD BOROUGH COUNCIL – PRIVACY NOTICE

How we will use your details

All representations received to the Stafford Borough New Local Plan 2020-2040 Issues & Options consultation document will be included in a schedule and made publicly available once the consultation has closed.

Stafford Borough Council will consider all representations received, using them to inform the next stage of the process for the New Local Plan 2020-2040.

Comments cannot be treated as confidential. Your personal information, such as your postal and email address will not be published and signatures will be redacted, but your name and organisation will be made available. We will only use your personal information to send you information on the New Local Plan and associated planning policy matters.

We believe you should always know what data we collect from you and how we use it, and that you should have meaningful control over both. As part of our ongoing commitment to transparency, and in relation to the new General Data Protection Regulations (May 2018), we have updated our Privacy Policy.

Stafford Borough Council are the data controller and you can find information about how we handle your personal data by visiting www.staffordbc.gov.uk/privacynotices and if you have any queries or would like to unsubscribe from receiving information then please contact forwardplanningconsultations@staffordbc.gov.uk



Representations to Stafford Borough Local Plan 2020 - 2040 'Issues and Options' Consultation

Land at Shaws' Lane, Eccleshall

March 2020

Contents

1.	Introduction.....	1
2.	Responses to Questions.....	3
3.	Land at Shaw's Lane, Eccleshall	24
4.	Planning Merits.....	25

Appendices

- Appendix I Site Location Plan
- Appendix II Icení – Technical Note
- Appendix III Previous Representations
- Appendix IV Aerial Photo

Prepared By: Stephanie Eastwood, Associate Director and Rachel Mythen, Planner
Date: March 2020

For and on behalf of GVA Grimley Limited t/a Avison Young

1. Introduction

- 1.1 Avison Young is instructed by Taylor Wimpey Strategic Land ("Taylor Wimpey") to make representations to Stafford Borough Council in respect of its Local Plan 2020 - 2040 'Issues and Options' Consultation.
- 1.2 These representations relate to the land to the north of Shaws Lane in Eccleshall. Taylor Wimpey has an agreement with the landowners to promote the site through the Council's Local Plan review process. The extent of the site is identified on the location plan at **Appendix 1**.
- 1.3 Taylor Wimpey is a very experienced and successful national house builder with an extensive track record in promoting sites through the planning system to deliver high quality new housing and mixed-use developments.
- 1.4 Taylor Wimpey is committed to working in consultation and partnership with local communities and stakeholders to ensure that its developments reflect local circumstances.
- 1.5 Avison Young submitted representations to the Council's 'New Local Plan: Scoping the Issues' document and the 'Settlement Assessment' paper in August 2018. We do not intend to repeat the comments made previously, therefore, the focus of these representations is to respond to the specific questions asked by the 'Issues and Options' consultation document and provide updates on the work which has been undertaken to understand the capacity of the site for housing development and demonstrate its suitability for residential development.
- 1.6 The remainder of this document is structured as follows:
- Section 2 – provides responses to the questions posed by the consultation document under the following headings:
 - Introduction
 - Vision and Strategic Objective
 - Sustainability and Climate Change
 - The Development Strategy
 - Delivering Housing
 - Delivering Quality Development
 - Environmental Quality
 - Connections
 - Section 3 – describes the site and its context;

- Section 4 - considers the planning merits of the site for residential development now, including technical work which has been undertaken by the team of specialist consultants engaged by Taylor Wimpey.

2. Responses to Questions

Introduction

Question 1.A. Is the evidence that is being gathered a suitable and complete list?

- 2.1 The list of evidence provided in Table 1 of the consultation document appears to be 'suitable', in principle, to support the plan-making process. In addition to those documents listed in the table, we agree that it will also be necessary for the Council to prepare an Infrastructure Delivery Plan, in consultation with the relevant infrastructure providers, and a CIL Viability Study to support the preparation of the Plan. These documents will be important to informing the preferred spatial strategy and site allocations.
- 2.2 There are a number of other pieces of evidence which should also be prepared to support the plan-making process, including a number of documents cited in other evidence base already prepared by the Council.
- 2.3 At this stage, we consider that the following evidence is also required:
- a Site Selection Paper, explaining the Council's approach to identifying proposed site allocations;
 - evidence on the deliverability of its commitments (including delivery rates);
 - a Strategic Transport Assessment, considering the highways impact and any mitigation (e.g. highway improvements) required to support the options considered;
 - an Integrated Transport Strategy, including assessment of sustainable transport availability and improvements required to support the options considered;
 - additional evidence in relation to any garden settlement promoted through the plan (see response to Question 5G);
 - evidence in relation to the settlement boundaries; and
 - an Open Space Assessment and Strategy;
 - a Health Impact Assessment; and
 - a Water Cycle Study.

- 2.4 The list of evidence base should be kept under review so that any additional evidence can be prepared in response to the preferred level of growth, spatial strategy and site allocations.

Question 1.B. Have any key pieces of evidence necessary for Stafford Borough's new Local Plan been omitted?

- 2.5 Yes, please see our response to Question 1.A. above which identifies a number of additional pieces of evidence which should be prepared to support the preparation of the new Local Plan.

Vision and Strategic Objectives

Question 3.A. Do you agree that the Vision should change?

- 2.6 Yes. The adopted vision considers and reflects the scale of growth required in the period to 2031, the spatial strategy and the prevailing policy climate at the time that the Local Plan was prepared and adopted in June 2014. Therefore, we agree that it would be appropriate for the vision to be reviewed and adapted to reflect the current policy framework (including the revised NPPF and updated Planning Practice Guidance (PPG)) and the scale of growth and spatial strategy to be planned for as part of the new Plan.

Question 3.B. Do you agree that the Vision should be shorter?

- 2.7 Yes, as a matter of principle, Taylor Wimpey agrees that the Vision for the new Local Plan could be far shorter than the adopted vision. However, it will be important to ensure that the vision is clear and captures all of the key themes for the future development of the Borough.

Question 3.C. Do you agree that a new Vision, whilst maintaining a commitment to growth, should more explicitly recognise the need to respond to Climate Change and its consequences?

- 2.8 Yes, in the light of the revised NPPF and increasing emphasis on climate change, with the UK Parliament having declared a climate emergency in May 2019, it would in Taylor Wimpey's view be appropriate for the vision to more explicitly recognise the need to respond to climate change.
- 2.9 The NPPF requires strategic policies to take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, water supply, biodiversity and landscapes. It also states that policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts.
- 2.10 It might, therefore, be appropriate for the vision to adopt similar terminology around climate change mitigation, adaptation and resilience measures and consider the range of issues highlighted in the NPPF.

Question 3.D. Should the spatially-based approach to the Objectives be retained? Does this spatially-based approach lead to duplication?

- 2.11 Taylor Wimpey recognises that a spatially-based approach to the Objectives may be appropriate as a matter of principle. However, it may be necessary for the Council to review which parts of the Borough are addressed by the objectives and amend those objectives having regard to the preferred spatial strategy to be set out in the new Plan.
- 2.12 We agree that the current spatial-based approach does lead to some duplication of objectives. However, it may be possible to address this and avoid unnecessary repetition by identifying a series of 'overarching' objectives which are common across the entire Borough.

Question 3.E. Is the overall number of Objectives about right?

- 2.13 There are a significant number of objectives in the adopted plan. The new Local Plan provides an opportunity to review, refine and consolidate the number of objectives. However, the number of objectives

required is likely to depend on the overarching vision for the new Plan and whether the Council decides to adopt spatially-based approach to setting its objectives or a more general approach to Borough wide objectives.

Sustainability and Climate Change

Question 4.A. Efforts to increase energy efficiency within the borough are currently detailed in Policy N2 of the adopted Plan for Stafford Borough. However, the increasing recognition that more needs to be done to mitigate the effects of climate change suggests that measures in excess of this will now be necessary.

a) Should the new Local Plan require all developments be built to a standard in excess of the current statutory building regulations, in order to ensure that an optimum level of energy efficiency is achieved?

- 2.14 Part (b) of paragraph 150 of the NPPF requires new development be planned in a way that “can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government’s policy for national technical standards.” Therefore, any policy relating to energy efficiency standards for new development should reflect the policy in the NPPF.
- 2.15 Notwithstanding the above Taylor Wimpey acknowledges that, between October 2019 and February 2020, the Government consulted on its plans for a new ‘Future Homes Standard’ to increase the energy efficiency requirements for new homes in 2020 through changes to Building Regulations.
- 2.16 The consultation document acknowledges that as “we move to the higher energy standards required by Part L 2020 and the Future Homes Standard, there may be no need for local authorities to seek higher standards and the power in the Planning and Energy Act 2008 may become redundant.” It goes onto state that the Government is “considering whether to commence the amendment to the Planning and Energy Act 2008 which would restrict local planning authorities from setting higher energy efficiency standards for new homes”.
- 2.17 It will, therefore, be important for any policy relating to the energy efficiency of new residential development to reflect any changes Building Regulations, the Future Homes Standard and to the Planning and Energy Act 2008 during the preparation of the Plan.

Question 4.E. Should the council implement a higher water standard than is specified in the statutory Building Regulations?

- 2.18 Part (b) of paragraph 150 of the NPPF states that “any local requirements for the sustainability of buildings should reflect the Government’s policy for national technical standards.”
- 2.19 Further guidance is provided in paragraph 13 of the PPG ‘Housing: optional technical standards’ which stipulates that “the local planning authority may also consider whether a tighter water efficiency requirement for new homes is justified to help manage demand.”

- 2.20 Paragraph 14 of the PPG goes onto clarify that "*all new homes already have to meet the mandatory national standard set out in the Building Regulations (of 125 litres/person/day)*" but where "*there is a clear local need*" (our emphasis) local planning authorities can set out policies requiring new dwellings to meet the tighter "*Building Regulations optional requirement of 110 litres/person/day*".
- 2.21 No evidence has been published, to date, which identifies a "clear need" to go beyond the national technical standards. Therefore, in order for any such policy to be considered 'sound' the Council would need to provide evidence of a 'clear need' including:
- a Water Cycle Study;
 - consultation with local water and sewerage company, the Environment Agency and catchment partnerships; and
 - consideration of the impact on viability and housing supply of such a requirement.

The Development Strategy

Question 5.A. a) Do you consider that the existing Policy SP1 addresses the requirements of the NPPF?

b) Do you consider that it is necessary to retain this policy in light of the recent change in Planning Inspectorate's view.

- 2.22 No, Policy SP1 does not reflect the latest version of the presumption in favour of sustainable development which is set out at paragraph 11 of the revised NPPF¹. It does not, therefore, address the requirements of the current NPPF.
- 2.23 The PPG² states that "*... there is no need for a plan to directly replicate the wording in paragraph 11 in a policy.*" On this basis, there does not appear to be any need to retain a policy which simply repeats the presumption in favour of sustainable development as established by national policy. However, other policies should reflect the presumption in favour of sustainable development (e.g. identify and provide for objectively assessed needs) and explain how the presumption will be applied locally.

Question 5.B. a) Which Annual Housing Requirement figure do you think will best meet Stafford Borough's future housing growth requirements? What is your reasoning for this answer?

b) Should a Partial Catch Up rate allowance be incorporated?

- 2.24 Taylor Wimpey has instructed IcenI to review the Economic and Housing Development Needs Assessment (EHDNA) prepared for Stafford Borough Council by Lichfields. IcenI has prepared a detailed technical note which sets out its analysis of the EHDNA and the various demographic and economic scenarios presented by it. A copy of this note is provided at **Appendix 2**.

¹ published in February 2019.

² Paragraph: 036 Reference ID: 61-036-20190723 Revision date: 23 07 2019

2.25 In summary, IcenI considers that there are:

- no exceptional circumstances justifying a housing requirement below the current standard method figure of 400 dpa and no basis for the alternative demographic scenarios presented by Lichfields (i.e. Scenario B & C) which would be contrary to the NPPF;
- circumstances and sound reasons for planning for higher levels of housing provision in the Borough over and above the local housing need calculated using standard method in accordance with Para 2a-010 in the PPG;
- a strong case for considering higher levels of housing need than the standard method in order to meet the Borough's affordable housing need, which IcenI consider has been under-estimated; and
- there are flaws in all of the economic scenarios presented by Lichfields (i.e. Scenarios D, E, F and G) which are considered in more detail in IcenI's report.

2.26 IcenI considers that the economic scenarios tested by Lichfields significantly underestimate the potential scale of jobs growth in the Borough in the plan period. IcenI's has, therefore, modelled an alternative scenario which would support the creation of approximately 17,000 jobs in the plan period and which would result in a housing need figure of between 750 and 870 dwellings per annum, depending on assumptions relating to commuting patterns. These figures would also be more consistent with average housing delivery rates in the Borough over the last five years (i.e. 737 dpa) than the standard method.

2.27 Notwithstanding the above, IcenI consider that there is further analysis to be undertaken including in relation to the economic growth potential and associated housing need as the Plan progresses further.

2.28 IcenI also notes that the Government has announced its intention to review the formula for calculating local housing need to ensure that the country is planning for the delivery of 300,000 homes per year. It notes that any changes may need to be reflected by the plan. On this basis, IcenI consider it appropriate for the Council to plan for a higher level of housing provision to future proof the strategy against any changes to Government policy in this area.

2.29 It is also important to note that affordable housing need is an important factor which would need to be taken into consideration in setting the housing requirement and in this case provide a strong basis for considering higher levels of housing provision.

Question 5.C. In calculating the Housing Requirement figure for the New Local Plan 2020-2040 should a discount be applied to avoid a double counting of new dwellings between 2020 - 2031? If a discount is applied should it be for the full 6,000 new homes currently accounted for in the adopted Plan for Stafford Borough or a reduced number (please specify reasons)?

2.30 The Council's starting point should be to establish the total amount of new housing required to support its ambitions in terms of economic growth in the Borough and to plan for this.

2.31 It would, as a matter of principle, be appropriate for the remaining capacity on sites allocated for housing in the adopted Plan to be taken into consideration in calculation of the residual requirement in the new Plan.

However, in doing so, the Council will need to be confident and able to demonstrate that any dwellings on those allocated sites are deliverable when assessed against the relevant policy and guidance in the NPPF and PPG before making a discount. If there is any uncertainty whether a site might deliver then a cautious approach should be taken (i.e. it should not be discounted from the requirement).

- 2.32 The Council will also need to ensure that it is able to demonstrate a rolling five year supply of deliverable housing land throughout the plan period in accordance with the requirements of the NPPF. Therefore, as the plan progresses, the Council will need to produce a trajectory to demonstrate that the new plan would deliver a continuous five year supply of deliverable housing land.
- 2.33 In addition to the above, we note that the Local Plans Expert Group (LPEG) has recommended that in order to boost significantly the supply of housing and ensure that plans are sufficiently flexible to adapt to rapid change, in accordance with the Framework, and ensure that needs are met over the plan period, Local Plans should identify sufficient deliverable or developable sites to meet the housing requirement for the full plan period plus an additional allowance for flexibility appropriate to local circumstances. Therefore, the New Local Plan should also incorporate an appropriate 'buffer' (i.e. allocate sufficient sites to provide flexibility) to ensure that the housing requirement would be met within the plan period and a five year supply of deliverable housing land would be maintained throughout the plan period. This would allow for the non-implementation of allocated or permitted housing developments or slippage in delivery.

Question 5.D. i. Do you agree with the basis for the preparation of the 2019 Settlement Hierarchy?

- 2.34 The 'Issues and Options' consultation document suggests that the Council has undertaken a 2019 review of the 'Settlement Hierarchy' to take account of existing commitments, settlement size and facilities/ services. However, the hierarchy presented appears to largely reflect the outcome from the 2018 Assessment. The Council has not published an updated version of the 'Settlement Assessment and associated profiles' Paper to explain how the 2019 Settlement Hierarchy has been reviewed and amended. On this basis, the comments set out in our representations dated September 2018 (see **Appendix 3**) remain valid.
- 2.35 Paragraph 5.16 of the consultation document suggests that some of the key service villages have received a 'disproportionate amount of housing than others' to date. However, Table 3 in the 'Strategic Development Site Options Study' prepared by Aecom demonstrates that when completions and commitments are taken into account the Key Service Villages have accommodated 12% of the total housing which accords with the distribution identified in the adopted Part 1 Plan.
- 2.36 Eccleshall is identified as a village which has grown by 23.8% (i.e. 323 new homes completed or committed) between 2011 and 2019. It is not clear from the consultation document how this has been calculated, how a judgement has reached on what is 'disproportionate' growth or indeed whether Eccleshall is considered to have experienced 'disproportionate growth'. The judgment on what is and is not 'disproportionate' does not appear to be based on any evidence or consideration of the capacity of those settlements to accommodate growth.
- 2.37 Taylor Wimpey considers that the scale of growth which has taken place in Eccleshall is not 'disproportionate'. Indeed it is clearly a sustainable settlement which has significant capacity to accommodate additional housing growth in the new Local Plan.

- 2.38 It is one of the largest settlements in the Borough, after Stafford and Stone, and has the critical mass to support a higher level of service provision. Eccleshall also supports a greater range of services than any of the other large villages identified in the Council's 'Settlement Assessment and associated profiles' Paper, has access to public transport and employment and clearly has the capacity to accommodate further growth.
- 2.39 It is also important that the Council takes into account market signals. Eccleshall is located in a part of the Borough which has higher average house prices and rental costs than the urban areas. There are, therefore, market signals pointing to stronger comparative demand in the area and additional housing provision will be important to addressing affordability issues in the area.
- 2.40 Trend-based demographic projections forecast in the EHDNA indicate that the population of primary school age falling over the plan period. Therefore, there is a need for further growth to support existing services and facilities, including the existing local shopping provision and educational infrastructure in Eccleshall, and the settlement's sustainability.
- 2.41 The NPPF supports the delivery of housing in locations which would "*enhance or maintain the vitality of rural communities*" and states that policies should "*identify opportunities for villages to grow and thrive, especially where this will support local services*". It is considered that the land promoted by Taylor Wimpey for residential development on the edge of Eccleshall would provide a sustainable opportunity to deliver housing which would: allow the village to grow, sustain and enhance local services and improve the vitality of the village community.

ii. Do you agree that the smaller settlements should be included in the Settlement Hierarchy?

- 2.42 Taylor Wimpey does not object, as a matter of principle, to the inclusion of smaller settlements in the Settlement Hierarchy. However, policy should make it clear which tiers of the hierarchy are considered sustainable locations that have the capacity to accommodate significant housing growth and which are not and the scale of housing growth to be accommodated having regard to the relative sustainability of the settlements in different tiers of the hierarchy.

5.F. a) In respect of these potential spatial scenarios do you consider that all reasonable options have been proposed? If not what alternatives would you suggest?

b) Are there any of these spatial scenarios that you feel we should avoid? If so, why?

c) Which of these spatial scenarios (or a combination) do you consider is the best option? Please explain your answer

- 2.43 It is considered that the local planning authority has considered all of the reasonable options in terms of 'spatial scenarios'.
- 2.44 In considering which option or combination of options, to pursue the Council's aim must be to deliver sustainable growth and to achieve that it must plan for development in sustainable locations / patterns.
- 2.45 We consider that this will mean adopting a strategy which disperses development proportionate to the relative sustainability of settlements in the Borough. This approach might include other spatial scenarios, such

as, the intensification of town and district centres and the intensification around the edges of the larger settlements.

2.46 This scenario would:

- ensure that development would be distributed throughout the settlement hierarchy having regard to the relative sustainability of settlements;
- allow the majority of development to be directed to the most sustainable and accessible settlements in the District (e.g. Stafford, Stone and Eccleshall);
- a proportionate amount of development to be directed to those settlements where it will enhance or maintain the vitality of rural communities and allow those settlements to grow and thrive;
- support economic growth and the vitality of the services, facilities and communities in these settlements;
- allow for a good "mix of sites" of varying scale in different local sub-markets to come forward quickly; and
- allow for development of a scale which would support new and improved services and facilities in the settlements.

2.47 We are not convinced that a 'string settlement' or a 'wheel settlement cluster' could deliver sustainable outcomes in the Borough. These approaches are likely to result in development being directed to less sustainable locations and smaller settlements, in preference to larger, more sustainable settlements and reliance on the private car for access to services, facilities and employment in other settlements within and outside the 'string' or 'cluster'.

2.48 A strategy including a garden settlement could, as a matter of principle, be successful. However, the NPPF makes it clear that local authorities should identify a "mix of sites" to deliver housing. A mix of site allocations would be particularly important to avoid overreliance on the delivery of a single garden community which would be dependent on the provision of strategic infrastructure and have a long 'lead-in' period before it would start to deliver significant housing.

2.49 The Council will need to provide evidence and justification to support whichever option or options it chooses to pursue.

Question 5.G. Do you consider that the consideration and utilisation of a new Garden Community / Major Urban Extension (or combination) would be helpful in determining the approach to satisfying Stafford Borough's future housing and employment land requirements? If you do think the Garden Community / Major Urban Extension approach is appropriate which of the identified options is most appropriate? Please explain your answer.

2.50 Yes, as a matter of principle, it is considered appropriate for the Council to consider the use of a new garden community in determining the approach to meeting Stafford Borough's housing and employment land requirements.

- 2.51 Indeed the NPPF recognises that *"the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns,"*. However, to be effective and consistent with national policy any 'garden community' should be *"well located and designed, and supported by the necessary infrastructure and facilities."* They should also be in suitable locations that can help meet identified needs in a sustainable way.
- 2.52 The NPPF is clear that such schemes should *"ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself ... or in larger towns to which there is good access"*. It also states that local planning authorities should make a *"realistic assessment of likely rates of delivery, given the lead-in times"*.
- 2.53 Therefore, if a garden community is to be promoted, the Council must pursue the option that will guarantee sustainable outcomes (i.e. is, as far as possible, self-sustaining and is sustainably linked). The Council must also make realistic assumptions about how such a settlement would be delivered, how long it would take to bring forward, when it would begin to deliver housing and at what rate it would deliver housing once under construction.
- 2.54 We have considered the options identified in the consultation document and reviewed the supporting 'Strategic Development Site Options Study' prepared by Aecom. Whilst this provides a useful starting point we have a number of concerns in relation to the robustness of the Study, its methodology and assumptions and the options identified by it, including:
- The 'broad areas of search' identified in the Study have been defined partly based on proximity to services and transport. However, this analysis is simplistic and does not, for example, appear to consider public transport accessibility by bus.
 - It is not clear how or why some of the 'areas of search'/'options' have been identified and others have been ruled out. For example, the options at Gnosall and Haughton appear to be located in areas identified as 'less suitable' for a garden community based on the analysis undertaken by Aecom.
 - The 'lead in'/' build out timescales and delivery rates (i.e. 300 - 600 dpa) assumed by Aecom appear to be ambitious and lack detailed explanation.
 - The analysis of technical constraints and viability appears to be fairly superficial, perfunctory and basic. It is not clear what level of analysis or engagement with statutory consultees and service providers has been undertaken as part of this assessment. For example, it is not clear in what level of detail the highways implications of the options have been assessed and how consultees have been engaged in that process.
 - The consideration of 'viability' is very basic also does not consider costs associated with funding off-site infrastructure which are likely to be very significant for each of the options identified.
 - In a number of cases only part of the land included within the 'options' identified by the Study has been promoted and is identified as 'available' in the Council's SHELAA. It is not, therefore, clear whether the wider area of land considered within the study is likely to be available for the development contemplated.

- It is not clear what level of engagement has taken place with consultees and infrastructure providers to identify and understand the costs and feasibility of the infrastructure required to support the individual options. For example, it is not clear whether Highways England supports the interventions that would be required to the strategic highway network in order to deliver a number of the options or if Network Rail would support the delivery of new railway stations which would be required for certain options.

2.55 Therefore, in order to properly consider the options it will be necessary for further detailed analysis to be undertaken to fully understand and provide suitable evidence in relation to:

- the potential for impact arising from each of the options in terms of a range of technical matters;
- the capacity of each of the options identified;
- the specific infrastructure requirements required to support each of the options (e.g. highways infrastructure, public transport improvements, local services and facilities, services and utilities);
- the feasibility of delivering the infrastructure required to support development, including whether such infrastructure is supported by statutory consultees and service providers (e.g. Highways England and Network Rail);
- the anticipated lead-in times and delivery rates having regard to infrastructure requirements and land availability; and
- the viability of individual options having regard to site constraints and the specific infrastructure requirements, particularly given the viability challenges faced by some of the Borough's existing SDLs.

2.56 In the light of the above, there is insufficient evidence to demonstrate that any of the options identified are capable of being genuinely sustainable and delivered as a garden community and allow us to say which, if any, is most appropriate.

2.57 However, at this stage, the only option which would appear to be of sufficient scale and be located to function effectively as a new and genuinely sustainable garden community supported by necessary infrastructure and facilities is 'Meecebrook'. Nonetheless, as set out above, further detailed work would be required to understand the deliverability of this option given the major investment in strategic infrastructure that would be required to support it and that only a relatively modest amount of the land identified in the study has been promoted and is identified as available in the Council's SHELAA.

2.58 Based on the information currently available, all other options do not appear to be of a scale or in a location that would sustain the level of services and employment required to create a sustainable new garden community and would be reliant on the private car for access to larger settlements for employment, education and other services.

2.59 If the Council ultimately decides to identify a new garden community it will also be important for it to identify and allocate a mix of other sites in sustainable locations in the Borough which are capable of being built-out relatively quickly. This would be important to:

- avoid overreliance on the delivery of a single garden community, which have long lead-in times and are reliant on the up front delivery of infrastructure;
- allow the Council's to demonstrate and maintain a 5 year supply of deliverable housing land throughout the plan period;
- support the vitality of existing communities and settlements in the Borough; and
- support economic growth in the urban area and other parts of the Borough.

2.60 The land promoted by Taylor Wimpey at Eccleshall would provide an excellent opportunity to deliver residential development in a sustainable location the New Local Plan within five years.

Question 5.H. i) Do you agree that the only NPPF-compliant Growth Options proposed by this document are No. 3 (Disperse development across the new settlement hierarchy) and No. 5 (Disperse development across the new settlement hierarchy and also at the Garden Community / Major Urban Extension) and No. 6 (Concentrate development within existing transport corridors)? ii) If you do not agree what is your reason? iii) Do you consider there to be any alternative NPPF-compliant Growth Options not considered by this document? If so, please explain your answer and define the growth option.

2.61 It is agreed that, in broad terms, Growth Options 3 and 5 would be compliant with NPPF. However, it will be important to ensure that an appropriate proportion of growth would be directed to each tier in the settlement hierarchy. Please see response to Question 5.D I for further comments in relation to the capacity for Eccleshall to accommodate additional growth.

2.62 On face of it, Growth Option 6 is also compliant with the NPPF. However, we note that the majority of the 'corridors' identified are based around road corridors and do not appear to consider the availability of public transport, facilities and services available, the sustainability of settlements in that corridor and if the relationships between the settlements in the 'corridors' are functional. Therefore, there is a risk that Growth Option 6 would not deliver the sustainable pattern of growth envisaged by the NPPF.

Question 5.I. Do you think that it is appropriate, in order to take the development pressure off the existing settlements in the Settlement Hierarchy, that at least one Garden Community should be incorporated into the New Local Plan? Please explain your answer.

2.63 Please see our response to Questions 5 F, G and H.

Question 5.J. What combination of the four factors: 1. Growth Option Scenario (A, D, E, F, G); 2. Partial Catch Up 3. Discount / No Discount 4. No Garden Community / Garden Community Should Stafford Borough Council put forward as its Preferred Option at the next stage of this Plan-Making process? Please explain your answer.

2.64 Elsewhere in our responses to other questions we have already identified that further work needs to be done before the Council, or stakeholders, are in a position to select preferred options in respect of its housing

requirement and its spatial strategy. However, at this stage, we consider that the evidence indicates the following combination:

1. Growth Option Scenario (A, D, E, F, G) - Option E but with amended jobs growth assumptions;
2. PCU – adjustments to be made to headship rates to take account of market signals;
3. Discount / No Discount – the Borough’s residual housing requirement should be calculated taking account of commitments where the Council is able to demonstrate that these are deliverable having regard to the provisions of the NPPF and PPG; and
4. Garden Community / No Garden Community – provision may be made for such a development provided that it would be:
 - a. deliverable and genuinely sustainable as garden community; and
 - b. supported by a mix of sites of different sizes in sustainable locations in the Borough (e.g. Eccleshall).

Question 5.Q. Do you agree with the methodology used to define settlement boundaries? If not please provide reasons for your response.

2.65 The proposed methodology for defining settlement boundaries is illogical and lacks clarity. It is not clear how the Council proposes to identify and then assess the relative merits of individual site options for new development at each settlement or if the Council proposes to draw settlement boundaries to reflect proposed allocations.

2.66 Once the extent of existing settlements and deliverable commitments has been established it is considered that the approach to defining settlement boundaries should be broadly as follows:

- I. all site options identified from 'Call for Sites' / SHELAA;
- II. site options refined having regard to:
 - a. the settlement hierarchy;
 - b. the scale of housing/employment need; and
 - c. the spatial strategy;
- III. site options robustly and transparently assessed based on a consistent set of criteria relating to suitability, availability and achievability;
- IV. preferred options identified; and
- V. revised settlement boundaries drawn to take account of preferred options.

2.67 Any alternative approach would need to be fully explained and justified.

Delivering Housing

Question 8.A. Should the council continue to encourage the development of brownfield land over greenfield land?

- 2.68 Paragraph 117 of the NPPF requires planning policies and decisions to make “as much use as possible of previously-developed or ‘brownfield’ land.” With this in mind, as a matter of principle, it is appropriate for the Council to, in the first instance, encourage the development of brownfield land ahead of greenfield land.
- 2.69 However, the Council’s own evidence³ states: “Given the scale of the development required in Stafford Borough over the plan period it will likely be necessary to allocate a level of greenfield land under all Options, as there is insufficient previously development land in sustainable locations available to meet the requirements.”
- 2.70 Therefore, if the Council is unable to identify sufficient ‘deliverable’ brownfield sites to meet its housing and employment needs through the SHELAA and Brownfield Register (accounting for any minimum density standards) it should then look to ‘deliverable’ greenfield land in the most sustainable locations for housing and employment in the Borough outside of the Green Belt (e.g. adjacent to sustainable settlements such as Eccleshall).

8.B. Do you consider that the enforcement of minimum density thresholds would have a beneficial impact on development within the borough? If so, do you consider: the implementation of a blanket density threshold; or a range of density thresholds reflective of the character of the local areas to be preferable? Why do you think this?

- 2.71 Paragraph 123 of the NPPF states that where there is an anticipated shortage of land to meet identified housing needs, it is especially important that policies avoid development at low densities, and ensure that developments make optimal use of the potential of each site. In these circumstances, it states that plans should contain minimum density standards for city and town centres and other locations that are well served by public transport. It also states that the use of minimum density standards should also be considered for other parts of the plan area and that it may be appropriate to identify a ‘range’ of densities that reflect the accessibility and potential of different areas.
- 2.72 The Borough has a range of settlements including large towns and small villages, all of which will have their own local distinctiveness and character which ought to be reflected in the design of development. It would not, therefore, be sound for the Council to apply a blanket minimum density across all development sites in the Borough.
- 2.73 Taylor Wimpey would, therefore, as a matter of principle, support a range of density thresholds which reflect the character of the local area but also allows flexibility to accessibility and other considerations such as market conditions and other site specific constraints and opportunities.

³ Paragraph 7.69 of the Sustainability Appraisal, prepared by Aecom (January 2020).

Question 8.C. Do you think that any adopted minimum density thresholds should reflect the availability of sustainable travel in the area?

- 2.74 Yes, but in considering the availability of sustainable travel it will be important to reflect the availability of all modes of sustainable travel including public transport and opportunities to walk and cycle. It is also important to note that availability of sustainable travel is just one factor to be taken into account when setting minimum density thresholds and there are a range of other factors to be considered (see our response to Question 8B).

8.E. In the New Local Plan should the Council: a) Apply the Nationally Described Space Standards to all new dwellings, including the conversion of existing buildings? b) Only apply the Nationally Described Space Standards to new build dwellings? c) Not apply the Nationally Described Space Standards to any development? Please explain your answer.

- 2.75 We draw the Council's attention to Paragraph 127 Footnote 46 of the NPPF, which states "*policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified*".
- 2.76 The Issues and Options Consultation document does not supply or refer to any evidence which demonstrates that there is a need for the Local Plan to include policies which require the application of the National Described Space Standards to all new dwellings.

Question 8.F. Do you consider that the housing mix detailed in the table above be sufficient in meeting the needs of all members of the community?

- 2.77 The housing mix presented in the consultation document is based on the analysis undertaken by Lichfields in the EHDNA.
- 2.78 IcenI has reviewed the analysis undertaken and concludes that the approach undertaken by Lichfields assumes that the growth in different types of households will be consistent with that in the base projections, where the greatest growth was in singles and couples aged over 65.
- 2.79 IcenI considers these assumptions to be unrealistic because scenarios which deliver a higher housing requirement relative to the base projections (288 dpa) are likely to see stronger household formation amongst younger households and are likely to see increased in-migration, which is what Lichfields show through their demographic modelling. The age profile of migration is skewed towards younger age groups and families. This would substantively affect the mix of properties needed to accommodate growth.
- 2.80 Therefore, IcenI concludes that the housing mix modelling moving forwards will need to be updated to align with the level of housing provision taken forwards through the Local Plan.

Question 8.H. Should the Council consider a policy requiring 10% of affordable homes delivered on new major development sites to be wheelchair accessible?

2.81 A blanket policy requiring 10% of affordable homes to be wheelchair accessible is likely to be onerous and unduly restrictive to new development. The level of affordable, accessible housing to be provided on any particular site should be based on site specific assessment, taking into account of evidence of local need and informed by a robust and up-to-date viability study.

8.I. a) Should the Council consider a policy requiring bungalows to be delivered on all major developments? If so, should there be a minimum number or proportion of such bungalows for each development?

2.82 Paragraph 61 of the NPPF requires local authorities to assess the demand for housing for different groups in the community, including older people and people with disabilities, and reflect such a demand in planning policies. It is agreed that a mix of size and types of homes should be delivered across the Plan period to meet the needs of different groups. However, the specific need and/or demand for such homes will vary across the Borough.

2.83 With this in mind, planning policies within the Local Plan should not seek to impose a blanket requirement for bungalows to be delivered on all major development. Instead, this matter should be considered on a settlement by settlement basis, taking into account local need identified in any relevant Housing Need Assessment and informed by a robust and up-to-date viability study.

2.84 Taylor Wimpey considers it will important to maintain flexibility to allow for changing local market circumstances, and would recommend that this be reflected within the policy wording.

Question 8.K. a) Do you consider an affordable housing provision of between 252 and 389 units per annum to be achievable?

b) In the instance whereby a lower provision of affordable housing is sought, would the supplementary supply of a diverse range of market housing in accordance with the findings of the EDHNA be sufficient?

2.85 The EHDNA provides an assessment of affordable housing needs in Section 11 which broadly follows the Basic Needs Assessment Model set out in the PPG, concluding in identifying a need for between 252 – 389 affordable homes per annum.

2.86 The EDNA establishes that, at a Borough level, a household would require an income of between £18,545 and £24,480 to afford to rent privately (without support), but would require a significantly higher income of £34,903 - £42,857 to be able to afford to buy a home (Table 11.1). There is, therefore, a substantial proportion of people (approximately 33% of newly-forming households using Lichfield's analysis) who have an income which means they could afford private rents, but cannot afford to buy a home.

2.87 The revised NPPF defines affordable housing as including housing that provides a subsidised route into home ownership for those that could not achieve home ownership. Icenis has reviewed Lichfield's analysis and

considers that its assessment fails to include the group of people that could not achieve home ownership through the market as having an affordable housing need and assesses the needs only of those unable to rent. This is inconsistent with the NPPF and PPG, and under-estimates affordable housing need as illustrated in Figure 13.5 of Lichfields' analysis.

- 2.88 As set out in **Appendix 2** Iceni has estimated the number of additional households who aspire to home ownership but would need support to do so. On the basis of its analysis Iceni identifies an affordable home ownership need for 62 homes per annum, in addition to the need for rented affordable housing shown in the Lichfields' analysis.
- 2.89 Iceni's analysis thus indicates that the total affordable housing need is at least 314 dpa (and potentially 451 affordable homes pa).
- 2.90 The EHDNA indicates that the notional proportion of affordable housing delivered on mixed tenure schemes is 30% [Para 11.69]. The Council will need to its affordable housing policy (i.e. % of affordable homes required in market housing schemes) by reference to viability. However, assuming that 30% of all homes delivered are affordable 1,047 homes overall would be required to deliver the affordable housing need in full.
- 2.91 Whilst this figure may not be achievable in full, the evidence clearly points to a significant need for affordable housing in the Borough. The Council should, therefore, consider higher overall housing provision and to do all that it can to deliver as much of the affordable housing need as it can in accordance with the PPG.
- 2.92 The provision of a diverse range of market housing will not compensate for an under-delivery of genuine affordable housing.

Question 8.N a) Should the council introduce a policy requiring all new developments with a site capacity of over 100 dwellings to provide 5% of those plots as serviced plots available for self and custom build homes? b) Should the council allocate plots for the purpose of self-build throughout the borough?

- 2.93 Under Section 1 of the Self Build and Custom Housebuilding Act 2015, local authorities are required to keep a register of those seeking to acquire serviced plots in the area for self-build and custom house building. The Issues and Options Consultation Document identifies that there are, at the time of publication, 42 individuals whom have expressed an interest in building a self-build home in Stafford Borough.
- 2.94 Paragraph 61 of the NPPF requires local authorities to assess the 'demand' for self-build or custom-build homes and for this to be reflected in policies. Therefore, any policy relating to self-build should be clearly informed and led by market demand.
- 2.95 There appears to be no evidence published alongside the Issues and Options Consultation Document which assesses the demand for self-build plots in the Borough or which justifies a policy requirement of 5% to meet current demand.
- 2.96 Under this policy the Council would require only 8 sites of 100 dwellings or more to meet the current demand for self-build plots. Any large sites brought forward after this would therefore be required to provide for a

demand that would have, at that point, already been met. This would undoubtedly result in ramifications to the delivery of market and affordable housing in the Borough.

- 2.97 With the above in mind, a blanket policy requiring all sites of 100 dwellings or more to provide 5% of plots as self-build is likely to be unduly onerous and restrictive, particularly as it is not based on evidence of demand. Such a policy would not be 'justified' or 'effective'.

Delivering Quality Development

Question 9.C. Should the New Local Plan: a) Continue to protect all designated sites from development, including maintaining a buffer zone where appropriate; b) Encourage the biodiversity enhancement of sites through development, for example, allocating sites which can deliver biodiversity enhancement; c) Require, through policy, increased long term monitoring of biodiversity mitigation and enhancement measures on development sites

- 2.98 Paragraph 174 of the NPPF requires plans to "identify, map and safeguard" national and locally designated sites of importance for biodiversity. As such, Taylor Wimpey supports, in principle, the continued protection of these designated sites through the Local Plan, proportionate with their significance. However, there is no basis in national policy or guidance for local plans to introduce buffer zones around designated sites.
- 2.99 As required by paragraph 20 of the NPPF, strategic policies should make provision for the "conservation and enhancement" of the natural environment. Whilst the allocation of sites that are able to deliver on-site biodiversity enhancement can help to achieve this objective, this is not the only solution. Enhancements can also be provided by way of financial contributions or the delivery of enhancements off site. With this in mind, a policy that encourages biodiversity enhancements must make clear that off-site or on-site enhancements are acceptable in planning terms.
- 2.100 Taylor Wimpey considers that the monitoring of biodiversity mitigation and enhancements measures on development sites is a detailed matter which can be appropriately addressed by the decision maker at the planning application stage and does not require detailed consideration in a strategic policy document.
- 2.101 Notwithstanding all of the above, Taylor Wimpey's land at Shaw's Lane in Eccleshall offers the potential to deliver both a substantial development and material enhancements in biodiversity.

Question 9.E. Do you consider that the described approach will achieve the Council's ambition of maintaining and increasing tree cover within the Borough? Are there any further measures which you think should be adopted to further enhance these efforts?

- 2.102 Taylor Wimpey support, in principle, the protection of existing quality trees and the Council's aspiration to increase tree cover in the Borough. It agrees, in principle, with points (a) and (b) of the Council's suggested approach but consider that protection of trees ought to be proportionate with the quality and landscape value of particular trees. However, a blanket policy requiring all new development to contribute to a Borough wide scheme to increase tree cover (point (c) of the Council's approach) is considered onerous.

Question 9.F. Should the Council consider a policy requiring that new developments take an active role in securing new food growing spaces? Yes / No. Please explain your answer. If yes, are the following measures appropriate? a) Protecting and enhancing allotments, community gardens and woodland; b) Supporting food growing, tree planting and forestry, including the temporary utilisation of cleared sites; c) Requiring major residential developments to incorporate edible planting and growing spaces; d) Ensuring landscaping is flexible so that spaces may be adapted for growing opportunities.

2.103 Paragraph 91, part c, of the NPPF states that *"planning policies and decisions should aim to achieve healthy, inclusive and safe places which enables and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling."*

2.104 Nevertheless, there appears to be no evidence published with the Issues and Options consultation, such as an Open Space Assessment, which confirms if there is a need in the Borough for allotments or for other types of food growing space on new developments. Any policy relating to the provision should be informed by evidence of need for such spaces in order to ensure that it is 'justified' and 'effective'. It should also reflect the fact that communal food growing spaces are not the only option and that private gardens may also provide spaces and opportunities for individuals to grow their own food.

Question 9.G Should the new Local Plan set out specific policies to require new development to minimise and mitigate the visual impact that it has on the Character Areas and quality of its landscape setting?

2.105 As a matter of principle, Taylor Wimpey agrees that the Local Plan should include a policy which relates to the landscape and visual impact of new development. However, in accordance with paragraph 170 of the NPPF any such policy should focus on *"protecting and enhancing"* valued landscapes, *"recognising"* the intrinsic character and beauty of the countryside and ensuring that new developments are *"sympathetic"* to character and landscape setting in accordance with paragraph 127.

Question 9.I. Should the new local plan:

1. Adopt a broad definition of historic environment encompassing a landscape scale and identification with natural heritage rather than the current protection of designated heritage assets approach?

2. Take a broader and more inclusive approach by explicitly encouraging the recognition of currently undesignated heritage assets, settlement morphology, landscape and sight lines?

3. Require planning applications relating to historic places to consider the historic context in respect of proposals for, for example, tall buildings and upward extensions, transport junctions and town centre regeneration.

4. *Encourage the maximisation of the wider benefit of historic assets by their incorporation into development schemes through imaginative design.*

5. *Consider historic places and assets in the context of climate change permitting appropriate adaptation and mitigation measures.*

2.106 Taylor Wimpey supports the principle of a policy in the Local Plan which seeks to conserve and enhance the historic environment in accordance with the tests in national policy and guidance. It would, in particular, support a policy which recognises that new developments can be designed to maximise and deliver enhancements to heritage assets and their settings.

Question 9.J. Do you consider that the current "Design" SPD provides sufficient guidance for design issues in the Borough? Please explain your rationale.

2.107 The Design SPD was adopted prior to the publication of the National Design Guide, in October 2019. As a result it would be appropriate for the Council to review and update the SPD, as necessary, in the light of the National Design Guide to ensure consistency.

Question 9.L. To support a new Local Design Review Panel should the new Local Plan: a. Require complex or Large-Scale Development to be subject to review by a Regional Expert Design Panel, to form a material consideration in the planning decision? b. To adopt (and commit to delivering), nationally prescribed design standards; e.g. Manual for Streets, Building For Life, BRE Homes Quality Mark, etc. c. Reconsider and update local design policies to more robustly reflect current national best practice, be based upon local Characterisation studies, and be specifically aligned with related and companion policy areas to support the wider spatial vision for the Borough.

2.108 Paragraph 129 NPPF states that local planning authorities should have "access to, and make appropriate use of, tools and processes for assessing and improving the design of development", including, but not limited to, the design review process.

2.109 Taylor Wimpey acknowledges the benefits that the design review process can have in achieving quality design. However, national planning policy does not require the use of this tool. Local policy ought to be sufficient to articulate the Council's ambitions in terms of design quality and prove a suitable tool in assessing planning applications. There is a real risk that by introducing a requirement for design reviews on all large scale developments that this could unnecessarily slow down the delivery of well-designed schemes.

Environmental Quality

Question 10.A. The currently adopted Plan for Stafford Borough does not include any policies aiming to increase air quality levels. The new Local Plan provides an opportunity to amend this. Therefore, should the council;

a) Ensure the installation of infrastructure to support the transition from petrol and diesel to electric powered vehicles on every major development?

b) Ensure all major development is accessible by regular public transport?

c) Enforce Air Quality Management Zones around areas of notable biodiversity importance?

d) Employ any further methods which you consider will aid in the improvement of air quality within the borough?

2.110 Taylor Wimpey support's the Council's overall ambition to improve air quality in the Borough. It is considered appropriate for policy to identify opportunities to improve air quality and encourage all major developments to provide infrastructure to support the transition to electric powered vehicles, where possible.

2.111 Whilst Taylor Wimpey agrees that new development should be directed to sustainable locations which are accessible by public transport, in accordance with paragraph 84 of the NPPF, it is important to recognise that in the more rural areas of the Borough development to may need to take place in locations which are less well served by public transport. In these situations, it is also important to consider the range of services and facilities which are easily accessible by other modes of sustainable transport (e.g. walking and cycling).

Connections

12.A. Do you agree with the general approach to delivering sustainable transport for Stafford Borough through the new Local Plan? If not please give a reason for your response?

2.112 Taylor Wimpey agrees that, as a matter of principle, the delivery of sustainable transport through the new Local Plan in accordance with the NPPF and other national planning guidance should clearly be supported as a matter of principle.

2.113 Taylor Wimpey notes the reference to an Integrated Transport Strategy at paragraph 12.3 of the Issues and Options Consultation document, and reserves its right to make further comment once this strategy has been published.

12.B. a) Do you agree with the approach to widening the choice of transport solutions through large scale development in key locations across Stafford Borough, related to the existing network? If not please provide a reason for your response. b) How do you consider that high quality walking and cycling networks can be developed through new development?

2.114 As a matter of principle, it is acknowledged that large scale development can unlock new opportunities to improve or grow the existing public transport network, and that this can help to deliver a 'genuine choice of transport modes' as required by paragraph 103 of the NPPF. However, this relies on such development taking place in locations which are well related to the existing network and being of a sufficient scale to support the improvements required to make sustainable transport a viable option in that particular location.

2.115 It should be recognised that smaller sites, in sustainable locations, can also contribute to widening the choice of transport solutions. For example, by connecting into and expanding existing pedestrian and cycle facilities which provide access to nearby services and facilities or enhancing or maintaining the vitality and viability of existing public transport services and it is important that this is recognised in any relevant local planning policy.

12.D. a) Do you consider it is necessary to set local parking standards for residential and non-residential development? b) If so should a similar approach of minimum standards be used for new developments across Stafford Borough or should maximum parking standards be identified for Stafford town centre area? Please provide a reason for your response.

2.116 Paragraph 105 of the NPPF states "if setting local parking standards for residential and non-residential development, policies should take into account:

a) The accessibility of the development;

b) The type, mix and use of development;

c) The availability of and opportunities for public transport

d) Local car ownership levels; and

e) The need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles."

2.117 Given the varying rural and urban characteristics of settlements in the Borough, it is considered that a range of standards which reflect the above criterion would be the most appropriate approach in this case. However, any standards should be flexible and allow opportunities for departures to reflect the local context and site specific opportunities and constraints. The Council should also demonstrate how each of the factors identified in paragraph 105 of the NPPF are taken into account.

2.118 Paragraph 106 of the NPPF states that maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in the city and town centres and other locations that are well served by public transport. Therefore, if the Council is minded to adopt maximum parking standards for Stafford town centre it should provide evidence to demonstrate clear and compelling justification in accordance with the requirements of the NPPF.

3. Land at Shaw's Lane, Eccleshall

- 3.1 The land at Shaw's Lane, Eccleshall extends to approximately 11 hectares. It is located immediately to the west of Eccleshall. It is approximately 6.5 miles south west of Stone and 8 miles northwest of Stafford.
- 3.2 The site comprises five agricultural fields. There are hedges and a number of trees around the site perimeter and the internal field boundaries. The site contains wooden electricity poles and associated overhead wires. An aerial photo is provided at **Appendix 4**.
- 3.3 To the south of the site is Shaws' Lane beyond which is open agricultural land and allotments.
- 3.4 To the east of the site is the primary residential area of Eccleshall. Immediately to the east of the site is the Overton Manor scheme which has recently been delivered by Taylor Wimpey.
- 3.5 To the north of the site are a number of residential dwellings along Church Street. Further to the north, beyond Church Street, is Holy Trinity Church and Eccleshall Cricket Club.
- 3.6 To the west of the site are a small number of residential dwellings located on Kerry Lane. Beyond Kerry Lane is open agricultural land.
- 3.7 The northern part of the site is approximately 270 metres from the village centre and it is within 600 metres of a Co-operative foodstore and 'The Crown' GP Surgery.
- 3.8 The southern part of the site is approximately 240 metres to the east of the Eccleshall Community Centre and Pre-School and approximately 100 metres to the south west of the Bishop Lonsdale Church of England Primary School.
- 3.9 There are bus stops within 600 metres of the site on High Street and Stafford Street. These bus stops provide services to Stafford Town Centre and Hanley.
- 3.10 The site is outside, but adjacent to, the settlement boundary. The northern part of the site is within the Eccleshall Conservation Area.
- 3.11 In summary, the site is in an accessible location on the edge of a small town/ large village.

4. Planning Merits

- 4.1 As set out above, Taylor Wimpey is promoting approximately 11 hectares of land on the edge of Eccleshall for allocation in the emerging Local Plan. The paragraphs below examine the planning merits of the site and confirm that it is a sustainable and deliverable option which should be allocated for housing in the new Local Plan.
- 4.2 A masterplan and Vision Document is being prepared by Taylor Wimpey and a team of specialist consultants which will provide evidence in relation to the deliverability of the land and Taylor Wimpey's vision for how a high quality scheme of residential development could be brought forward on the land.
- 4.3 The project team appointed by Taylor Wimpey comprises:
- Town Planning – Avison Young
 - Masterplanning and Urban Design - IDP
 - Landscape and Visual Impact – EDP
 - Heritage – EDP
 - Flood Risk & Drainage - Enzygo
 - Services and Utilities – Enzygo
 - Arboriculture – EDP
 - Ecology - EDP
 - Highways and Access - Curtins
- 4.4 At this stage, based on the detailed analysis of opportunities and constraints and masterplanning work which has been undertaken by the project team to date, it is envisaged that the site could deliver approximately **130 to 160 dwellings** on the southern part of the site which is located outside the Eccleshall Conservation Area depending on the density of development (i.e. at 30-36 dwellings per hectare).
- 4.5 It is envisaged that the open land within the Conservation Area would be enhanced and made accessible to members of the public for amenity, recreational use and play with a network of paths which would connect into existing pedestrian routes and rights of way around the site.
- 4.6 Taylor Wimpey intends to engage with Officers at the Borough Council and members of the Parish Council and other local stakeholders shortly to discuss its emerging vision for the site and how it could contribute towards the housing needs of the Borough.
- 4.7 In the meantime, the paragraphs below examine the planning merits of the site and confirm that it is a sustainable and deliverable option for the delivery of housing growth in the Borough which should be allocated for housing in the Local Plan Review.

Deliverability

- 4.8 The Glossary of the NPPF (2019) establishes that, in order to be deliverable, sites should be:
- **available** now;
 - offer a **suitable** location for development now; and
 - be **achievable** with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable.
- 4.9 It goes onto state that sites allocated in the development plan should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years. The Planning Practice Guidance (PPG) also states that sites should be deliverable in years 1 to 5 of the plan period.

Availability

- 4.10 The PPG states that a site is:
- “considered available for development, when, on the best information available...there is confidence that there are no legal or ownership impediments to development. For example, land is controlled by a developer or landowner who has expressed an intention to develop”.*
- 4.11 Taylor Wimpey has an agreement with the landowner to promote the site through the Local Plan Review process on its behalf.
- 4.12 The landowners are willing sellers and the future development of the site would be in the hands of a very experienced and successful national house builder, which would be capable of securing planning permission and delivering housing quickly assuming that the land is allocated in due course.
- 4.13 There is no legal ownership or other technical impediments. Accordingly, the site is available now in NPPF terms.

Suitability

- 4.14 The PPG confirms that a site or broad location can be considered *“suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated.”* It goes onto state that when considering constraints, plan-makers may wish to consider survey information and other relevant information, such as:
- *“national policy;*
 - *appropriateness and likely market attractiveness for the type of development proposed;*
 - *contribution to regeneration priority areas;*
 - *potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation.”*

4.15 The PPG also states that when assessing sites against the adopted development plan, plan-makers will need to take account of how up to date the plan policies are and consider the relevance of identified constraints on sites / broad locations and whether such constraints may be overcome.

4.16 When using the emerging plan to assess suitability, plan-makers will need to account of potential policy changes or other factors which could impact the suitability of the site / broad location.

Consistency with Policy

4.17 The site is in a sustainable location, immediately adjacent and very well-related to the existing built-up area of the small town / large village of Eccleshall. The site is located within walking distance of a range of amenities in the village centre and is accessible to public transport including bus services to Stafford Town Centre and Hanley.

4.18 The adopted Plan identifies Eccleshall as a 'Key Service Village' which is one of the more sustainable locations for housing, employment and service provision in the Borough after the main towns of Stafford and Stone. It is also the only 'Key Service Village' with its own defined 'Local Centre (i.e. a more substantial retail offer than any of the other Key Service Villages).

4.19 The Plan also acknowledges that the settlement has a significant level of services and facilities for a relatively small population. It is also located in close proximity to the Raleigh Hall Recognised Industrial Estate which is earmarked for expansion in the adopted Plan and provides employment opportunities within 2 kilometres of the site.

4.20 The emerging settlement hierarchy for the new Local Plan also identified Eccleshall as a 'larger village' which is considered to be a sustainable location for housing growth.

4.21 The village contains a comprehensive range of services and facilities including:

- a Primary School
- a Community Centre and Pre-School;
- a GP Surgery;
- dentists;
- a Co-operative foodstore;
- a butchers;
- an off-license;
- a post office;
- a pharmacy;
- a library;
- hair salons;
- a florists;
- a cricket club;
- churches;
- public houses;
- takeaways, cafes and restaurants; and
- comparison retail shops.

- 4.22 Eccleshall is also well located for access to the Walton Hall Academy.
- 4.23 Approximately 20% of the Borough comprises land in the Green Belt. Eccleshall is not constrained by the Green Belt unlike a number of the other Key Services Villages (i.e. Barlaston, Tittensor and Yarnfield).
- 4.24 The site has an estimated capacity of between 130 and 160 dwellings assuming that development is restricted to the land outside the Eccleshall Conservation Area and applying a density of between 30 and 36 dwellings per hectare.
- 4.25 The Council's 'Issues and Options' document indicates that there were 2,011 households in Eccleshall at the time of the last census in 2011. The Neighbourhood Plan suggests that approximately 325 new homes could be accommodated on land in defined the settlement boundary. It is the second largest settlement in the Borough, excluding Stafford and Stone, and one of the larger rural settlements in the Borough with sufficient critical mass to support a higher level of service provision.
- 4.26 The provision of additional 130 - 160 homes on the land north of Shaws Lane would result in only an 8% increase in the number of households in Eccleshall which would not put undue pressure on existing infrastructure and could support improvements to or the expansion of infrastructure in the village to provide increased capacity where required through Section 106 contributions.
- 4.27 Eccleshall is clearly a sustainable location with the capacity for housing growth having regard to national policy and adopted and emerging local policy. Indeed the work undertaken by IcenI indicates that growth will be necessary to support local service provision including retaining existing local shopping provision, and the population of primary school age (which in trend-based demographic projections in the EHDNA Figure 10.1 are shown to fall). Therefore, growth is needed to support settlement sustainability.
- 4.28 It is, therefore, considered that development of the site for approximately 130-160 dwellings is a suitable, sustainable option which would provide a valuable source of market and affordable in the Borough. Development on the land at Shaw's Lane would also provide a range of other benefits including:
- a mix of house types (e.g. smaller starter homes and larger family homes);
 - a mix of market and affordable housing;
 - a high quality development which respects the character and setting of the village;
 - the retention of natural features (particularly mature trees and hedgerows);
 - significant areas of new publically accessible open space including elements such as children's play equipment and new walking routes;
 - additional spending capacity and creation of a more balanced age profile in the village to support local businesses and services;
 - increased patronage of local services and facilities to support their vitality, viability and long-term sustainability;
 - jobs during the construction phase of development;

- revenue from the New Homes Bonus and Council Tax;
- other financial contributions, which might be put towards improvements to local services and infrastructure and other initiatives pursued by the Parish Council.

Technical Matters

Flood Risk

- 4.29 Enzygo has been appointed by Taylor Wimpey to undertake an assessment of flood risk and provide advice in relation to the drainage strategy for any future development.
- 4.30 It has confirmed that the site is located within Flood Zone 1 on the Environment Agency Flood Map for Planning and has a low probability of fluvial flooding. Residential development is considered appropriate in Flood Zone 1 accordance with the guidance outlined within the NPPF.
- 4.31 The Staffordshire Strategic Flood Risk Assessment (2014) also appears to indicate that the site has not been subject to any historic flooding and is at low or no risk of flooding from other sources (e.g. surface water, reservoirs or groundwater).
- 4.32 The nearest watercourse identified on Ordnance Survey mapping is 165m to the south west of the site. No other form of flood risk is considered to pose a significant risk to the site.
- 4.33 On the basis of the work undertaken by Enzygo it is envisaged that surface water drainage attenuation will be provided on site in the form of sustainable drainage features such as swale(s) and detention basin(s). Foul drainage is likely to discharge via a connection to the existing foul sewer to the east of the site on Shaws Lane.
- 4.34 Therefore, flood risk and drainage does not represent a significant constraint to development.

Ecology and Trees

- 4.35 An Ecological Appraisal and Tree Survey has been undertaken by EDP. This work confirms that the site is currently in arable crop production comprising five fields bound by low-quality hedgerows, which contain several mature and quality trees.
- 4.36 The site and adjoining land is not subject to any ecological designations. The nearest designated site is the Cop Mere SSSI which is approximately 1.9 kilometres from the site. Due to the intervening distance it is considered unlikely that residential development of the site would have an adverse impact on designated sites.
- 4.37 EDP concludes that the ecological value of the site is limited to the hedgerows and trees, which are likely to support common and widespread breeding birds and bats. It is anticipated that these hedgerows and trees do could be retained and incorporated into the future design of the development ensuring the retention of these ecological features.
- 4.38 A badger sett was also identified in the south-eastern part of the site which would be retained with any development offset from the sett by an appropriate distance.

- 4.39 Given the limited ecological value of the site and availability of open space in the northern part of the site, in the Conservation Area, the development presents an opportunity to provide biodiversity enhancements, for example, through the provision of species-rich wildflower grassland and informal green space.
- 4.40 All trees on the site are subject to a Tree Preservation Order. Trees in the northern part of the site are also protected by virtue of their location in a Conservation Area. The majority of the trees are located along the site and internal field boundaries. It is envisaged that development proposals would be able to avoid the removal of quality trees.
- 4.41 On the basis of the survey work undertaken it is unlikely that ecology or arboriculture would pose a constraint to residential development on the site.

Heritage and Archaeology

- 4.42 The northern part of the site is located within the Eccleshall Conservation Area. There are also a small number of statutorily listed buildings immediately to the north of the site.
- 4.43 In the light of this, EDP has been appointed to undertake an appraisal of heritage and archaeological constraints and opportunities and the potential impact of development on them.
- 4.44 EDP has confirmed that the Eccleshall Conservation Area Appraisal identifies land within the northern part of the site as 'important green space', but gives no further details as to the background to this reference or its significance.
- 4.45 EDP considers that there is considerable potential for the improvement and enhancement of this space through the incorporation of green space more in line with the character of Town Meadow, to the north of the High Street. EDP considers that this could enhance the glimpsed views available to the land within the Conservation Area from within the town and Grade 1 Listed Holy Trinity Church.
- 4.46 EDP considers that the emerging proposals, which consider new development outside the Conservation Area only, could be sensitively designed to preserve the character of Kerry Lane and views along it. Therefore, the allocation and development of the southern part of the site could avoid any harm to the character, appearance and setting of the Conservation Area, and offer opportunities for its enhancement.
- 4.47 The scheduled monument of Eccleshall Castle, which includes four listed buildings, including two at Grade II*, is located approximately 440m to the north of the site, on the other side of the town. Land within the site is substantially screened in views from the castle and its environs, such that EDP concludes that there is no potential for any harm to this asset.
- 4.48 EDP notes that there are a range of other historic buildings within Eccleshall, including a number of listed buildings within the vicinity of the site. However, it considers that the land has little bearing on their setting and factors such as local topography, built form and vegetation minimise the potential for any impact on their heritage significance.
- 4.49 It is, therefore, considered that the sensitive development of the site would result in no potential for harm to designated heritage assets.

- 4.50 No archaeological remains are recorded within the site and it is likely that the site has been in agricultural use since the Saxon times. EDP notes that there is always the potential for archaeological remains which are not currently known to be present. However, that could be investigated in due course as part of the development and there is no evidence of any remains of sufficient importance to constrain the development of the site.
- 4.51 On this basis, we conclude that that heritage and archaeology would not represent an unsurmountable constraint to residential development on the southern portion of the site which lies outside the designated Conservation Area. Indeed the development of the site provides opportunities to enhance the land in the Conservation Area and improve public access to it.

Highways and Access

- 4.52 The site is currently accessed from Shaws' Lane. Taylor Wimpey has taken highways advice from a specialist transportation consultant, Curtins, who has advised that suitable access for the site in residential use for 130-160 dwellings could be taken from Shaws' Lane, with appropriate visibility splays, subject to widening of the carriageway along part of Shaw's Lane and the provision of a 2 metre footway along the northern side of the carriageway.
- 4.53 The site is accessible on foot to a range of facilities in the village centre via Shaws' Lane and Church Street to the north. It is also within walking distance of bus stops in the village which provides services to Stafford town centre and Hanley and within 2 kilometres of employment opportunities at the Raleigh Hall Recognised Industrial Estate.
- 4.54 Curtins has assessed the potential impact of development on the capacity of the local highway network. IT has concluded that existing local junctions experience limited congestion at peak times and would have sufficient capacity to accommodate the low levels of additional trips that would be generated by development at the site.
- 4.55 It has also assessed accident data in the vicinity of the site and considers that there is no existing safety issue in the local area that is likely to be exacerbated by development. Therefore, development is anticipated to have no significant detrimental effect upon any existing highway safety concerns.
- 4.56 On this basis we conclude that highways and access is not considered a significant constraint to development.

Loss of Agricultural Land

- 4.57 The Natural England Agricultural Land Classification Maps appear to identify the site as Grade 3 "good to moderate" agricultural land. It is not clear whether the site comprises Grade 3a (i.e. best and most versatile agricultural land) or Grade 3b agricultural land. However, the site would be significantly below the threshold (20Ha) for Natural England to be consulted on planning applications which involve the loss of agricultural land. Therefore, agricultural land is not a significant constraint to the development of the site.

Services and Utilities

- 4.58 Enzygo has been appointed to provide utilities and services advice in relation to the site.

- 4.59 It has confirmed that all utility apparatus (sewage, water, electricity, telecommunications) are present in the vicinity of the site and will be available to serve the proposed development and could be upgraded where necessary.
- 4.60 Western Power Distribution infrastructure records indicate the presence of overhead electricity apparatus within the development site boundary. Diversion of this apparatus would be required to facilitate development. It is envisaged that this apparatus can be diverted underground and routed through the road network to be which would serve the development.
- 4.61 Therefore, utilities and services would not pose a significant constraint to development on the site.

Landscape and Visual Impact

- 4.62 EDP has undertaken a landscape and visual appraisal of the site. EDP confirms that the site is not subject to any national or local landscape designations. It notes the edge of settlement location and context of the site provides the opportunity for development to tie into and complement the settlement pattern.
- 4.63 EDP identifies that the site provides an opportunity to retain and enhance existing landscape features (e.g. trees and hedgerows) and to create new landscape areas and green infrastructure to reflect the local landscape character.
- 4.64 EDP has confirmed that there are no significant elevated landforms overlooking the site and that the existing hedgerow and hedgerow trees along the eastern edge of the site generally filter views of the site from dwellings to the east of the site. It confirms that there are open and filtered views into the site from the Public Right of Way (PRoW) which runs just outside the eastern boundary.
- 4.65 However, in summary, EDP concludes that much of the site is remarkably well contained from the wider area and has the capacity for residential development. It concludes that views from the wider environment are limited by the effect of intervening residential built form within Eccleshall, and mature landscape features.
- 4.66 On this basis, landscape and visual impact are not considered to represent a significant constraint to development on the site.

Summary

- 4.67 In summary, it is considered that there are no technical constraints that would prevent the development of the site for approximately 130 -160 dwellings.

Achievability

- 4.68 The PPG states that in order to be considered achievable there must be:

"...a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period."

- 4.69 The site is available now. Assuming that the site is allocated for residential development in the new Local Plan a planning application could be submitted for the residential development of the site very quickly.

- 4.70 Taylor Wimpey would be able to start to deliver housing on site shortly after the grant of planning permission and immediately following site preparation works and the discharge of any relevant planning conditions.
- 4.71 Therefore, there is a realistic prospect of housing being delivered on the site within five years.
- 4.72 As set out above, there are no significant site constraints that might prevent development or make the development unviable. Therefore, the development of part of the site for between 130 and 160 dwellings would be viable.
- 4.73 For the reasons set out above, the entire site is available, suitable, and achievable and is, therefore, deliverable and a sustainable option for the delivery of housing in the Borough.

Avison Young

March 2020

Appendix I

Site Location Plan



Appendix II

Iceni – Technical Note



To: **Stephanie Eastwood, Avison Young**
From: **Nick Ireland, Director, Icen**
Date: **23.03.20**
Title: **Stafford Economic & Housing Development Needs Assessment**

1. Icen has been commissioned by Taylor Wimpey Strategic Land to undertake a technical review of the *Economic & Housing Needs Assessment* prepared for Stafford Borough Council by Lichfields, to inform the initial consultation which the Council is undertaking on Issues and Options as part of the preparation of a new Borough Local Plan 2020-40. This note considers issues related to:

- Economic and demographic-led needs;
- Affordable housing needs;
- Housing mix; and
- Local housing dynamics and the distribution of development.

a. Initial Consideration of Overall Housing Needs

1. The I&O Consultation Document sets out 7 scenarios for housing provision ranging from 349 – 746 dwellings per annum (dpa). Scenario A is the standard method based on current data (408 dpa). Scenarios B and C represent essentially sensitivity testing based on alternative demographic assumptions. Scenarios D-G then represent scenarios based on alternative assumptions on future employment growth.
2. Icen has sought to review the basis of the scenarios, and their appropriateness for strategic planning purposes.

Standard Method and Alternative Demographic Scenarios

3. The current national policy framework is that the minimum local housing need generated by the standard method of 408 dpa is a minimum starting point. 408 dpa was the correct figure at the time of publication of the Consultation Document. Updating this to take account of the latest data shows a minimum local housing need for 400 dpa.

Updated Stafford LHN Calculation

	Stafford
Household Growth pa over next 10 years, 2020-30 (2014-based)	331
Median workplace-based affordability ratio, 2019	7.35
Adjustment Factor	21%
Local Housing Need	400

4. As set out by Lichfields [Paras 10.9 – 10.13] this is intended to be a ‘minimum starting point’ and as we consider later, there may well be circumstances and sound reasons for planning for higher levels of housing provision.
5. Lichfields developed two alternative demographic scenarios. Scenario B inputs data from the 2014-based Household Projections for projected household growth over the plan period rather than over a 10 year period (2019-29) into the standard method, resulting in a lower need for 349-404 dpa. Scenario C inputs takes account of a larger population base in 2019, but otherwise uses consistent assumptions to Scenario B. These scenarios show a need for between 329 – 404 dpa, which is below the minimum local housing need set by the standard method. No clear evidence is shown that there are underlying issues with the data which fed into the standard method figure. These scenarios are simply based on testing alternative demographic assumptions. However the intention in introducing the standard method was to make the approach of calculating a minimum figure ‘simpler, quicker and more transparent’, and to ensure a consistent starting point in calculating housing need in local authorities across the country.
6. Lichfields analysis provides no evidence that there are underlying issues with the 2014-based Household Projections; indeed both Scenarios B and C draw core assumptions from these projections. They simply adopt alternative timeframes and base assumptions, using an approach which is inconsistent with the PPG. IcenI therefore considers there is no justification for a figure below the standard method.
7. IcenI notes that ONS has since published new 2018-based Sub-National Population Projections in March 2020. These show much stronger population growth, of 17,057 persons over the 2020-40 plan period, compared to population growth of 8,243 in the 2014-based SNPP (EDHNA Scenario B) and 8,508 persons in the rebased population scenario (Scenario C). More recent data thus points to significant stronger population growth, and thus housing need.

Scenarios for Employment Growth

8. Scenarios D, E, F and G consider alternative scenarios for economic growth and housing need. To analyse these, IcenI has sought to consider first the scenarios for future economic performance; before moving on to appraise the assumptions used in linking homes and jobs.
9. Lichfields EHDNA Report puts forward four economic-driven scenarios. We have summarised these in the table below:

Lichfields’ Economic Driven Scenarios

	D. CE Baseline	E. Regeneration	F. Past Trends	G. CE + 50%
Jobs Growth, 2020-40	5,929	12,478	13126	8900
Base Dwellings pa	435	647	683	540
PCU Dwellings pa	489	711	746	597

10. Scenario D (CE Baseline) is derived from an off-the-shelf econometric forecast from Cambridge Econometrics November 2018 release. This is based essentially on historic performance of different sectors in the borough relative to regional/national trends triangulated against CE’s expectations on future sectoral performance. Such forecasts are a) relatively volatile; and b) take no account of circumstances which may mean that the future is different from the past such as through enhanced connectivity. CE themselves would describe the forecasts as a tool to understand how the economy might perform, to be brought together with local understanding and intelligence, rather than an ‘answer’ in themselves.

11. Lichfields' analysis shows that employment in the Borough increased by on average 0.83% pa over the 2000-18 period, this being a period in which there was a very strong decline in manufacturing jobs (-5,100) but growth in a range of other sectors. CE's forecast looking forwards is however of a rate of growth of less than half of this, at 0.39% pa. The EHDNA provides only a very brief commentary on the CE baseline forecast (Scenario D). No coherent explanation is provided by Lichfields as to why economic fundamentals in the area are now significantly poorer such that future growth rate in employment would be so substantially less. IcenI consider that a detailed critical analysis of the baseline forecast and why this differs so substantially from past trends is lacking. The jobs growth in B-class sectors in the CE baseline forecast is very modest.
12. Considering the expected performance of different sectors as shown in Table 7.2 in the EHDNA and bringing this together with the wider analysis and stakeholder engagement undertaken, IcenI would suggest that:
 - The CE forecasts significantly underplay the future growth potential in distribution/logistics activities which derive from the shift in the retail sector from stores to online and growth in advanced manufacturing, together with Stafford's location relatively centrally within the UK (with major population centres within a 4.5 hr drivetime) and on the M6. This influences transport, warehousing and postal, wholesale and retail trade.
 - The CE forecasts for office-based professional services are also significantly below historical growth rates when in reality with HS2 making Stafford one of the best connected places in the region, the reality is that stronger growth than has been seen historically seems more likely. Furthermore with growth in telecommunications, the characteristics of the rural parts of the Borough can be expected to support professional services growth in small and home-based businesses.
 - Growth in some other sectors in the forecast, including construction and consumer-related services such as retail, food and beverage and recreational services, are influenced by population and housing growth. Planning for higher growth will support higher jobs growth in these areas.
13. In addition, we would agree with the Lichfields' comment that the forecast of a reduction in manufacturing jobs seems unrealistic; and note local stakeholders consider advanced manufacturing will grow. Whilst this may not represent significant additional numbers of jobs, it will contribute to growth in the wealth of the local economy feeding through into spending and performance of other sectors.
14. The evidence thus suggests to us that it is likely that employment growth will be stronger than in the CE baseline forecasts.
15. Scenarios E, F and G make adjustments to the baseline CE forecasts to derive a series of alternative scenarios for economic performance. These are as follows:
 - Scenario E (Regeneration Scenario) – this scenario assumes that in addition to the CE forecast of 5,929 jobs to 2040 there will be an additional 2,913 jobs generated through delivery of a new garden community and 2,723 jobs generated through delivery of Stafford Station Gateway. Total employment is thus expected to grow by 12,478 (2020-40).
 - Scenario F (Past Trends) – this scenario projects forward the 0.83% pa growth rate achieved historically; resulting in net jobs growth of 13,128 (2020-40).
 - Scenario G (CE + 50%) – this scenario simply uplifts the CE baseline figure for total jobs of 5,929 by 50% resulting in net jobs growth of 8,894 (2020-40).
16. Ultimately the question which needs to be asked is: what is a realistic assessment of how the Borough's economy will perform?

17. An analysis of recent trends between 2015-18 shows substantial growth in wholesale/retail, in ICT and professional services and construction; set against a decline in particular in public administration. Whilst manufacturing employment overall remained static, there was growth in employment across a number of manufacturing sub-sectors including chemicals, food products and textiles.

Change in Employment, Stafford Borough 2015-18

	2015-18
G : Wholesale and retail trade; repair of motor vehicles and motorcycles	1000
M : Professional, scientific and technical activities	1000
F : Construction	500
J : Information and communication	250
L : Real estate activities	100
E : Water supply; sewerage, waste management and remediation activities	-50
R : Arts, entertainment and recreation	-250
N : Administrative and support service activities	-500
O : Public administration and defence; compulsory social security	-1000

Source: IcenI analysis of BRES data

18. The recent performance points to an outlook across key growth sectors which is significantly more positive than the CE baseline forecasts.
19. Applying a 50% uplift to the baseline forecasts as per Scenario G is a relatively crude approach; and a more detailed assessment of sectoral performance and growth potential would be required.
20. IcenI consider that the Past Trends Job Growth is - as a matter of principle - a credible scenario, not least as it is based on the average growth rate over a sustained period which covers a full economic cycle. However, the particular factors underpinning very recent growth warrant further consideration.
21. Turning to the Regeneration Scenario, this assumes that delivery of a new garden community of 10,000 homes will deliver gross jobs of 12,337 (EHDNA Table 4.7). It assumes that all of these new jobs will be net additional to the baseline forecasts; and that 3,713 of them will be delivered over the plan period to 2040 on the basis that the commercial elements are delivered alongside residential. In addition it assumes that provision of c. 70,000 sq.m of office space, together with leisure, retail and hotel and some industrial space at the Station Gateway will deliver 5,672 jobs in gross terms. It then assumes that 50% of these will already be factored into the CE baseline.
22. There are a number of relatively high level assumptions which IcenI would recommend are tested further. Firstly whilst it might be reasonable to treat a new Garden Community as additional to the District's underlying development/ economic needs, there will be jobs created beyond the B-class and retail sectors from a community of this scale; including in healthcare, education, construction, recreation and other service activities. None of these are captured within the Lichfields' analysis.
23. Secondly, in respect of the Station Gateway, the working assumption that 50% of the jobs will already be factored into the CE baseline [Para 7.41] is not supported by the evidence. Table 7.2 shows that the CE baseline forecast supports growth of 437 jobs in office-based activities (B1a/b Use Classes) over the plan period. Yet Figure 7.5 shows workforce jobs growth of 5,381 in B1a office activities at the Station Gateway (out of a total of 5,672 jobs). Even if all of the non-office jobs at the Station Gateway are assumed to be 'factored in' to the CE baseline (i.e. 291 jobs),

the office component generates 4,944 additional jobs over and above the baseline projections. This level of growth over the baseline forecasts is significantly greater than the 2,723 jobs figure assumed by the Council.

24. The evidence thus indicates that the detailed modelling in the Regeneration Scenario may significantly underplay the scale of jobs growth which could arise from the delivery of a new garden community and Station Gateway.

25. Standing back from the detail of the scenarios themselves, IcenI would consider that:

- The borough has a strong manufacturing sector which the evidence and stakeholder engagement undertaken indicates is expected to see employment grow;
- The borough is well placed to see growth in logistics/distribution as a function of its location and main road/rail connectivity. Growth in this sector is likely given the shift in retail spending towards online;
- The delivery of HS2 will cut journey times to London from 75 to 53 minutes and make Stafford one of the best connected places in the region. It is reasonable to expect this to support the Borough's economy and act as a catalyst for an office scheme around the Station. But housing growth will be important in delivering this by providing an available workforce as well;
- These core growth drivers will support additional spending in the local economy including on retailing and local services; and demand for additional public services such as health and education which in turn will require higher employment.

26. Total employment in Stafford in 2020 is estimated at 73,300 of which 37.5% is estimated to be in B-class sectors. On the basis of the above analysis, IcenI consider that taking account of the level of office floorspace proposed at the Station Gateway, office-based employment can be expected to grow by c. 5,400. No additional allowance has been made for office floorspace growth within a Garden Community. For industrial sectors (industrial and logistics/distribution), we assess that employment growth of 2,300 could be expected over the plan period in line with the EHDNA Regeneration Scenario. We consider that given these particular drivers, a higher proportion of employment growth will be in B-class uses at 45% of the total; but that there will be c. 9,500 additional jobs created in other non-B sectors. This looks reasonable against the past trend forecast.

27. In total, we consider that this scenario could therefore support employment growth (net) of 17,300 over the plan period. This would represent a growth rate of 1.1% pa in employment over the plan period. Whilst this is above past trends, this rate of growth would seem reasonable given that the manufacturing sector is no longer expected to see significant job losses, the significant accessibility improvements envisaged, the strength of the area for logistics/distribution, and jobs in service sectors expected to be supported.

28. The delivery of HS2, a new garden community and a western access route to Stafford clearly represent circumstances in the terms set out in Para 2a-010 in the PPG where it would be appropriate to plan for higher housing provision than the standard method suggests.

Assumptions Used in Linking Homes and Jobs

29. The assumptions which Lichfields' use to link homes and jobs are set out in the EHDNA in Para 10.55 and Appendix 4. The use of 2014 population and household projections for base assumptions is reasonable, albeit that more recent ONS projections show more modest growth in life expectancy.

30. Office for Budget Responsibility (OBR) labour market participation rates are also reasonable, however again the latest data is now derived from the July 2018 Fiscal Sustainability Report. This taking account of more recent data shows more positive assumptions on improvements in economic participation amongst some older age groups. It would be reasonable to use the more recent data.
31. The Lichfields' modelling assumes a labour force ratio of 0.93 implying net in-commuting. This appears to be based on Annual Population Survey data over the last five years. The appropriateness of this assumption needs to be tested. Figure 7.1 in the Lichfields report shows relatively rapid jobs growth over the period between 2011-18 with employment rising in the order of 8,000 jobs; but the Annual Population Survey shows the number of residents in employment having grown by around 1,300 persons over this period. What appears therefore to have happened is that employment growth has run ahead of growth in the workforce (which is linked to housing delivery) resulting in growth in net in-commuting. Iceni does not consider that it is reasonable to perpetuate this moving forwards.
32. Iceni consider that the evidence clearly points to demand outstripping housing supply in Stafford in recent years. Housing delivery performance has exceeded housing targets; but the above evidence suggests that housing need has been stronger still.
33. The final core assumption is related to headship rates. Lichfields have modelled two scenarios: using assumptions in the 2014-based household projections; and a 'partial catch-up scenario' in which the headship rates of those aged 15-34 are adjusted to make up half of the difference between the 2008-based household projections and 2014-based household projections, presumably over the plan period.
34. Government's objectives for housing are to improve affordability, and this is why there is an affordability adjustment build into the standard method. The Partial Catch-Up Scenario essentially models the demographic effects of this on improving the ability of younger households to form (rather than seeing them further deteriorate). This is therefore an appropriate planning assumption to use when modelling the economic-led scenarios, as without this the assumption is that the ability of younger households to form will fall over time, as Figure 10.5 in the EHDNA shows, which would not be consistent with Government guidance or aspirations. The PPG sets out that where an alternative approach is used to calculate housing needs, it must take into account market signals; and only the PCU scenario does this.
35. However Iceni would question whether it is appropriate to assume a recovery in household formation is phased over 20 years. It is arguably more in line with Government aspirations to increase housing supply and improve affordability to model this recovery over a 10 year period to 2030.
36. On the basis of the above, Iceni has modelled the level of housing need required to support the delivery of 17,000 jobs over the plan period using the following assumptions:
 - Taking the base population from ONS 2018 Mid Year Population Estimates, which is then rolled forward to 2020 using data on fertility, mortality and migration from the ONS 2016-based SNPP;
 - Assumptions on fertility and mortality and migration profile derived from ONS 2016-based SNPP;
 - Adopting economic participation rates from OBR 2018 Fiscal Sustainability Report and applying these to a local baseline position (from 2011 Census) for Stafford;
 - An assumption that 4% of people have more than one job (double jobbing);

- Modelling two scenarios for commuting; one which takes the 2011 Census commuting ratio of 0.96 and holds this constant; and another which simply takes a 1:1 ratio between expected growth in residence- and workplace-based employment in the Borough;
- Modelling a Partial Catch-Up in headship rates for younger households aged 25-34 and 35-44 over the course of the plan period;
- A vacancy rate of 3.2% taken from para 9.60 of the Stafford EHDNA.

37. The results of these scenarios are shown in the table below. Icení's analysis indicates that to support 17,000 jobs over the plan period would require between 750-870 dpa depending on the assumptions made on commuting.

Icení Scenarios for Housing Need to support 17,000 jobs (2020-40)

	Households 2020	Households 2040	Change	Per annum	Dwellings per annum
0.96 Commuting Ratio	59,689	74,208	14,520	726	749
1:1 Commuting Ratio	59,689	76,545	16,857	843	870

Source: Icení Demographic Modelling

38. A further consideration in respect of the commuting dynamic is the proposals for a Strategic Rail Freight Interchange (SFRI) at Four Ashes. Whilst this is in South Staffordshire, Stafford would be one of the nearest urban areas. Chapter 14 of the Environmental Statement submitted alongside the DCO indicates that this scheme would support 8,550 additional jobs on site. The Transport Assessment included a Gravity Model indicating that 5.13% of the workforce was expected to be drawn from Stafford. If these are multiplied together, the indication is that c. 440 additional workers employed at the SFRI at Four Ashes could be expected to live within the Borough. There is the potential that this will influence housing need within the Borough.

b. Affordable Housing Needs

39. The EHDNA provides an assessment of affordable housing needs in Section 11. This follows the Basic Needs Assessment Model set out in the PPG in broad terms, concluding in identifying a need for between 252 – 389 affordable homes per annum.

40. As the EHDNA sets out at Para 11.3, affordable housing is defined in the NPPF as including housing that provides a subsidised route into home ownership for those that could not achieve home ownership through the market. Put simply, the Lichfields' assessment does not deal substantively with this group.

41. The EDNA establishes that at a Borough level, a household would require an income of between £18,545 - £24,480 to afford to rent privately (without support), but would require a significantly higher income of £34,903 - £42,857 to be able to afford to buy a home (Table 11.1). There is thus a substantial proportion of people who have an income which means they could afford private rents, but cannot afford to buy a home. Using the analysis in Table 11.2, around a third (33%) of newly-forming households fall within this group.¹

42. But the Lichfields' modelling of affordable housing needs assesses the needs only of those unable to rent **or** buy (see Step 2.2 and Paras 11.32 and 11.34). Those that fall within the gap whereby they can afford to rent (but cannot afford to buy) are not assessed in the Lichfields' modelling to have an affordable housing need. This is inconsistent with the NPPF and PPG, and

¹ 32.5% - 33.2% based on the two alternative affordability tests

under-estimates the affordable housing need. Indeed the concept here is illustrated in Figure 13.5 in Lichfields' analysis.

43. We have therefore sought to estimate the numbers of additional households who aspire to home ownership but would need support to do so. Our approach takes account of the following:
- Current need: the 2011 Census showed 7,200 households living in the PRS in 2011 in Stafford. The English Housing Survey estimates the PRS size to have increased by 20% since this point, and therefore it is assumed that it accommodates 8,640 households. If a third fall in the rent-to-buy gap, this would equate to a current need of 2,851 households. This is equivalent to an annualised figure of 143 pa over a 20 year period.
 - Newly-Arising Need: newly-forming households are estimated at 1051 per annum. If a third of these fall within the rent-to-buy gap, the newly-arising need is 347 households pa.
 - Supply: we assume that 50% of lower quartile sales over the last 3 years are available to meet needs of those within this group, reflecting that some properties have issues of quality/condition. This equates to sales of 428 per annum.
 - On this basis we identify an affordable home ownership need for 62 homes pa, in addition to the need for rented affordable housing shown.
44. Icení's analysis thus indicates that the total affordable housing need should thus fall between 314 – 451 affordable homes per annum. The EHDNA indicates that the notional proportion of affordable housing delivered on mixed tenure schemes is 30% [Para 11.69] on which basis 1047 homes overall would be required to deliver the affordable housing need in full.
45. The evidence thus clearly points to the need to consider higher overall housing provision than the standard method. It supports consideration of an economic-led approach to calculating a housing requirement.

c. Housing Mix

46. The EHDNA considers the mix of housing needed in Section 13. In simple terms it considers current occupancy patterns of different household types, and then applies this to the projections of different household types in the 2014-based Household Projections. The projected household growth for different household types is uprated on a pro rata basis to align with the standard method LHN figure of 408 dpa (as described in EHDNA Para 13.11).
47. This modelling approach assumes that the growth in different types of households will be consistent to that in the base projections, where the greatest growth was in singles and couples aged over 65. These assumptions are unrealistic.
48. Scenarios which deliver a higher housing requirement relative to the base projections (288 dpa) are likely to see stronger household formation amongst younger households (as for instance the PCU Scenarios model) and are likely to see increased in-migration. This is what Lichfields show through their own demographic modelling but is not followed through to the analysis of housing mix. The age profile of migration is skewed towards younger age groups and families, and this would substantively affect the mix of properties needed to accommodate growth.
49. The housing mix modelling moving forwards will thus need to be updated to align with the level of housing provision taken forwards through the Local Plan.

d. Distribution Scenarios

50. Icenote note that a range of distribution scenarios have been set out within the Issues and Options document by combining the scenarios for different levels of growth with six different distribution scenarios which we have paraphrased as follows:
- Focus on Stafford and Stone
 - Stafford, Stone and Key Service Villages
 - Dispersed growth across the Settlement Hierarchy
 - Focused growth within Garden Communities
 - Dispersed Growth plus Garden Communities
 - Transport Corridors.
51. The NPPF is focused on supporting sustainable growth at both urban and rural communities; and there are strong reasons why growth will be necessary at a range of tiers within the settlement hierarchy.
52. Eccleshall is identified in EHDNA Table 12.1 as having 2,116 dwellings. The Issues and Options document shows that it has had planning permissions granted for a further 323 dwellings since. It is thus one of the larger rural settlements in the Borough with sufficient critical mass to support a higher level of service provision.
53. Eccleshall's higher service provision is reflected in Table 12.2 in the EHDNA, which shows that it has 2 health facilities a library, hourly bus service, employment provision within relative proximity etc. The EHDNA evidence points to availability of local employment opportunities, both within the settlement and the immediate surrounding area. In addition there is an existing level of educational infrastructure within the local area, including Eccleshall Pre-School, Bishops Lonsdale Primary School and Walton Hall Academy.
54. These attributes support the identification of Eccleshall as a sustainable location for growth. Growth will be necessary to support local service provision including retaining existing local shopping provision, and the population of primary school age (which in trend-based demographic projections in the EHDNA Figure 10.1 are shown to fall). Growth is thus needed to support settlement sustainability.
55. In considering the growth options, it is important that the Council takes into account relevant market signals. The EHDNA shows the Rural West and Rural East of the Borough, in which Eccleshall is located, as having higher average house prices [EHDNA Figure 4.1], and higher rental costs than the urban areas in the Borough [EHDNA Table 9.8]. There are thus market signals pointing to stronger comparative demand. Additional housing provision will be important to addressing affordability in these areas.
56. A further strategic consideration is the timescales over which different sizes of site will contribute to supply, and the need to ensure that there is a five year land supply on adoption of the Plan; and that this is maintained over time. Providing for growth at a number of different locations within the Borough, which draw on different local sub-markets, as well as ensuring that there is not undue reliance on large strategic sites, and sites are allocated which can come forwards quickly will be important to ensuring the overall deliverability of the Plan and its ability to support and maintain a 5 year housing land supply.

e. Issues moving Forwards

57. The preparation of the Borough Local Plan is at a relatively early stage. The Government published a policy paper, *Planning for the Future*, on 12th March announcing its intention to bring forward a Planning White Paper in Spring 2020 and to review the formula for calculating local housing need to ensure that the country is planning for the delivery of 300,000 homes per year. A key implication of this is that undue reliance should not be placed on the current standard method figure of 408 dpa (or the updated figure of 400 dpa). This, and the method from which it was derived, is likely to have changed before the Plan is submitted.

58. An appropriate approach for the Council to take would be to plan on the basis of a higher level of housing provision in order to future proof the strategy against changes in Government policy in this area.

f. Summary of Key Points

59. The key points arising from Icení's analysis are as follows:

- The latest data points to a minimum local housing need for 400 dpa. There are no exceptional circumstances justifying a housing requirement below this; but the delivery of HS2, a new garden community and a western access road to Stafford would clearly represent circumstances in the terms set out in Para 2a-010 in the PPG where it would be appropriate to plan for higher housing provision than the standard method suggests.
- The latest ONS population projections point to much stronger trend-based population growth of more than double that which fed into the standard method calculations;
- An economic-led approach to considering what scale of housing to plan for is reasonable, however Icení's analysis does not find the scenarios set out in the EDHNA that convincing. The EDHNA does not adequately interrogate why there is such a substantial difference between the CE baseline forecast and past growth trends (Scenarios D and F), with generally a lack of critical interrogation of the CE baseline forecast.
- Icení considers that the CE baseline forecast underplays growth potential in distribution/logistics given shift of retailing online and Stafford's locational attributes. Lower growth in office-based professional services given telecoms improvements and HS2 appears unlikely. Lichfields themselves considered the manufacturing forecast as too pessimistic.
- Scenario G which models a 50% uplift on the CE baseline forecast is relatively crude and does not provide any further assistance in understanding how Stafford's economy is expected to perform in the future.
- The Regeneration Scenario (Scenario E) is potentially more useful. However, Lichfields scenario development takes no account of jobs in healthcare, education, construction, recreation which would be associated with delivery of the garden community. It does not properly consider the degree to which jobs at the Station Gateway would be additional to the baseline. It thus potentially significantly under-estimates job growth arising from these identified drivers.
- Our initial analysis shows that to support 17,000 jobs over the plan period would require between 750-870 dpa depending on the assumptions made on commuting.
- We would recommend therefore that further analysis of economic growth potential and associated housing need is undertaken in taking forwards the Plan.
- Icení's analysis also shows that the EHDNA does not take account of the needs of those who can afford to rent privately but who aspire to home ownership but require help to do so. These fall within the definition of households with an affordable housing need in the 2019 NPPF. Addressing this, we estimate that there is a need for 341 – 451 affordable homes per year. The scale of affordable housing need provides a strong basis for considering higher levels of housing provision in the Borough.
- The EHDNA's analysis of the mix of different sizes/types of homes needed will also need to be revisited to take account, in due course, of a preferred scenario for growth.

- Finally, Icení's analysis also addresses questions regarding the distribution of development within the Borough. It points to a need for growth at a range of tiers in the settlement hierarchy in particular in places which provide everyday services; and identifies market signals which promote growth in the Rural East and Rural West of the Borough to address particular affordability pressures.

Appendix III

Previous Representations



Taylor Wimpey Strategic Land

Representations to Stafford Borough Council's 'New Local Plan: Scoping the Issues' Consultation

Land North of Shaws Lane, Eccleshall

September 2018

Contents

1.	Introduction	1
2.	The Site and Context	2
3.	The Planning Policy Context	3
4.	Scope of the New Local Plan	9
5.	The Need for Housing	11
6.	The Location for Housing	13
7.	Other Questions	17
8.	Merits of the Site	20
9.	Summary of Key Matters	27

Appendices

Appendix 1	Site Location Plan
Appendix 2	Aerial Photo
Appendix 3	Borough Plan Proposals Map – Eccleshall
Appendix 4	Conservation Area Boundary – Eccleshall

Prepared By: Stephanie Eastwood, Principal Planner & Robert Gardner, Director

Status: FINAL

Draft Date: September 2018

For and on behalf of GVA Grimley Limited

1. Introduction

- 1.1 GVA is instructed by Taylor Wimpey Strategic Land ("Taylor Wimpey") to make representations to Stafford Borough Council in respect of its consultation on the 'New Local Plan: Scoping the Issues' document and the 'Settlement Assessment' paper.
- 1.2 Our representations concern the land to the north of Shaws Lane in Eccleshall. Taylor Wimpey has recently agreed terms with the landowners to promote the site through the Local Plan review process. The extent of the site is identified on the location plan at **Appendix 1**.
- 1.3 Taylor Wimpey is a very experienced and successful national house builder with an extensive track record in successfully promoting sites through the planning system to achieve high quality new housing and mixed use developments.
- 1.4 Taylor Wimpey is committed to working in consultation and partnership with local communities and stakeholders to ensure that its developments reflect local circumstances.
- 1.5 The purpose of these representations is to respond to the current consultation and promote the land for residential development.
- 1.6 The remainder of this document is structured as follows:
 - Section 2 – considers the site and its context;
 - Section 3 – provides a summary of the relevant planning policy context;
 - Section 4 – considers and provides comments on the proposed scope of the New Local Plan;
 - Section 5 – comments on the need for housing in the Borough;
 - Section 6 – provides our response in relation to the location of new housing in the Borough and the Council's 'Settlement Assessment' paper;
 - Section 7 – responds to a number of the other questions posed in the 'Scoping the Issues' consultation document;
 - Section 8 – considers the planning merits of the site for residential development now; and
 - Section 9 – summarises the key matters.

2. The Site and Context

- 2.1 The site extends to approximately 11 hectares. It is located immediately to the west of Eccleshall which is a small town (also referred to as a large 'key service village'), approximately 6.5 miles south west of Stone and 8 miles north west of Stafford.
- 2.2 The site comprises five agricultural fields. There are hedges and a number of trees around the site perimeter and the internal field boundaries. The site contains wooden electricity poles and associated overhead wires. An aerial photo is provided at **Appendix 2**.
- 2.3 To the south of the site is Shaws' Lane beyond which is open agricultural land and allotments.
- 2.4 To the east of the site is the primary residential area of Eccleshall. Immediately to the east of the site is the Overton Manor site which is currently under construction by Taylor Wimpey.
- 2.5 To the north of the site are a number of residential dwellings along Church Street. Further to the north, beyond Church Street, is Holy Trinity Church and Eccleshall Cricket Club.
- 2.6 To the west of the site are a small number of residential dwellings located on Kerry Lane. Beyond Kerry Lane is open agricultural land.
- 2.7 The northern part of the site is approximately 270 metres from the village centre (**Appendix 3**) and it is within 600 metres of a Co-operative foodstore and 'The Crown' GP Surgery.
- 2.8 The southern part of the site is approximately 240 metres to the east of the Eccleshall Community Centre and Pre-School and approximately 100 metres to the south west of the Bishop Lonsdale Church of England Primary School.
- 2.9 There are bus stops within 600 metres of the site on High Street and Stafford Street. These bus stops provide regular services to Stafford Town Centre and Hanley.
- 2.10 The site is outside, but adjacent to, the settlement boundary. The northern part of the site is within the Eccleshall Conservation Area (**Appendix 4**).
- 2.11 In summary, the site is in an accessible location on the edge of a small town/ large village.

3. The Planning Policy Context

3.1 The Development Plan for Stafford Borough comprises: the “Plan for Stafford Borough – Part 1”, which was adopted in June 2014; the “Plan for Stafford Borough - Part 2”, which was adopted in January 2017; and the Eccleshall Neighbourhood Plan which was made in July 2016.

The Plan for Stafford Borough – Part 1

3.2 The Plan for Stafford Borough Part 1 provides the Council’s vision and strategy for the Borough until 2031.

3.3 Policy SP2 of the Plan states that provision will be made for 500 dwellings to be built per annum over the plan period (i.e. 10,000 dwellings in total).

3.4 Policy SP3 establishes the ‘Sustainable Settlement Hierarchy’ for development in the Borough. It states that the majority of development will be delivered through the Hierarchy as follows:

1. County Town of Stafford;
2. Market Town of Stone; and
3. **Key Service Villages of Eccleshall, Gnosall, Hixon, Great Haywood, Little Haywood / Colwich, Haughton, Weston, Woodseaves, Barlaston, Tittensor and Yarnfield.**

3.5 Policy SP4 sets out the proportions of the homes that should be built in Stafford, Stone, the ‘Key Service Villages’ and the rest of the Borough during the plan period, as follows:

- Stafford - 70%;
- Stone - 10%;
- **Key Service Villages - 12%;** and
- Rest of Borough Area - 8%.

3.6 Eccleshall is identified as a Key Service Village. The 11 Key Service Villages are required to accommodate 12% of the overall housing requirement for the Borough over the Plan period, totalling 1,200 new houses. The Plan confirms that, at the time, taking account of existing completions and commitments there was a residual requirement of 537 dwellings to be allocated at the Key Service Villages through the Part 2 Plan.

3.7 Policy SP7 states that settlement boundaries will be established for the Settlement Hierarchy. It confirms that development of a scale and nature appropriate to secure the sustainability of each settlement (i.e. in terms of housing proposals is consistent with the delivery of the proportions of development intended by Policies SP2, SP3 and SP4). It clarifies that development in other locations (i.e. other settlements or in the countryside) will only be supported in a small number of circumstances to support ‘rural sustainability’.

The Plan for Stafford Borough – Part 2

- 3.8 The Plan for Stafford Borough Part 2 guides where new development will take place across the Borough and identifies how places will be shaped in the future.
- 3.9 Policy SB1 defines the boundaries of each of the settlements, including Eccleshall, within which new housing development is generally considered acceptable.
- 3.10 The Part 2 Plan confirms that Eccleshall is “one of the larger Key Services Villages in the Plan” and that Eccleshall Parish Council has produced a Neighbourhood Plan for the Parish. It confirms that the settlement boundary identified in the Neighbourhood Plan is consistent with Spatial Principle SP7.
- 3.11 The Part 2 Plan clarifies that the settlement boundary has been drawn to include:
- land to the north of the village, which is bordered by the River Sow;
 - land to the east of the village which has planning permission for 130 houses (14/20665/OUT); and
 - land in the south west next to the school that is also allocated for housing in the Neighbourhood Plan (i.e. the Overton Manor site which is currently under construction by Taylor Wimpey).

Eccleshall Neighbourhood Plan

- 3.12 The Eccleshall Neighbourhood Plan was prepared by the Parish Council and covers the same area as Eccleshall Parish. It was formally ‘made’ and became part of the Development Plan in July 2016.
- 3.13 The Neighbourhood Plan has a plan period to 2031, consistent with the period covered by the Borough Plan. It supports housing development within the defined settlement boundary.

The Emerging Local Plan

- 3.14 In July 2017 the Council started to prepare its ‘Local Plan Review’ which will fully replace the Plan for Stafford Borough with a new development strategy, site allocations and development management policies.
- 3.15 A report to Stafford Borough Council’s Cabinet in July 2017 confirmed that the Council is undertaking a review of the Local Plan because the delivery of housing and employment sites across the Borough has meant that “more land is required to provide for future growth”. It also confirms that the Council would like to align the strategy and lifespan of the Plan for Stafford Borough with the Growth Strategy which is being prepared by the Constellation Partnership for the region (Cheshire and Staffordshire) to 2050. It also identifies that there is a legal requirement to periodically review the local plan.
- 3.16 The Council undertook an initial ‘Call for Sites’ consultation which ended in January 2018. GVA prepared and submitted representations to this consultation, on behalf of Taylor Wimpey, in respect of the land north of Shaws’ Lane, Eccleshall.
- 3.17 This report and accompanying documents provide Taylor Wimpey’s response to the ‘Scoping the Issues’ consultation on the new Local Plan and the accompanying ‘Settlement Assessment’ paper.

3.18 It is understood that the current timetable for next stages of the Review is as follows:

- Issues and Options July 2018;
- Preferred Options May 2019;
- Publication February 2020;
- Submission August 2020;
- Examination November 2020; and
- Adoption April 2021.

The National Planning Policy Framework (2018)

3.19 The NPPF was initially published on 27 March 2012 and set out the Government's guidance on town planning matters. A revised version of the NPPF was published on 24 July 2018.

3.20 Annexe 1 of the NPPF clarifies the transitional arrangements for plan-making. In particular that plans submitted for examination on or before 29 January 2019 should be examined against the policies in the previous version of the Framework and any plans submitted after 29 January 2019 will be examined against the policies in the revised NPPF. The timetable for the preparation of the 'New Local Plan' indicates that it will be examined in the context of the policies in the revised NPPF.

Presumption in Favour of Sustainable Development

3.21 The presumption in favour of sustainable development remains at the heart of the revised version of the NPPF. Paragraph 11 sets out how the presumption should be applied. In respect of plan-making, it states that:

"a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;

b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

Plan-making

3.22 Section 3 provides the updated policy in respect of plan-making. It states that Plans should:

"a) be prepared with the objective of contributing to the achievement of sustainable development;

b) be prepared positively, in a way that is aspirational but deliverable;

c) be shaped by early, proportionate and effective engagement between planmakers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;

d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

e) be accessible through the use of digital tools to assist public involvement and policy presentation; and

f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)."

3.23 The NPPF states that the development plan for an area should comprise of a combination of 'strategic' and 'non-strategic' policies. It clarifies that 'strategic policies' should set out an *"overall strategy for the pattern, scale and quality of development"*, and make sufficient provision for a range of development including housing. Paragraph 22 requires strategic policies to look ahead over a minimum 15 year period from adoption.

3.24 Paragraph 23 makes it clear that strategic policies should provide a *"clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development."* (i.e. planning for and allocating sufficient sites unless these needs are demonstrated to be more appropriately met through other mechanisms such as non-strategic policies).

3.25 The revised NPPF (paragraph 24) maintains the importance of the 'duty to cooperate' on strategic matters across administrative boundaries. Paragraph 27 requires strategic policymaking authorities to prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress made in cooperating to address these. It states that these should be made publically available throughout the plan-making process to provide transparency.

3.26 Paragraph 31 states that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence that is adequate and proportionate taking into account relevant market signals.

3.27 Paragraph 33 requires policies in local plans to be reviewed to assess whether they need updating at least once every five years, and then to be updated as necessary. This should take into account changing circumstances affecting the area or any relevant changes to national policy.

3.28 The revised NPPF maintains the four tests of 'soundness' for the examination of policies and plans, albeit with a series of revisions. Paragraph 35 sets out that in order to be found 'sound' policies and plans should be:

"a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from

neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.”

Housing Need and Supply

- 3.29 Paragraph 60 introduced the “*standard method*” to be used to determine the minimum number of homes needed in strategic policies, unless exceptional circumstances justify an alternative approach. In addition to the ‘local need’ identified through the standard method it states that any needs that cannot be met within neighbouring areas should be taken into account in establishing the amount of housing to be planned for.
- 3.30 Paragraph 61 states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.
- 3.31 Paragraph 65 requires authorities to establish a housing requirement for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. It goes on to state that within this overall requirement, strategic policies should set out a housing requirement for designated neighbourhood areas.
- 3.32 Paragraph 67 establishes that policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability including a supply of:
- a) specific, deliverable sites for years one to five of the plan period; and*
 - b) specific, developable sites or broad locations for growth, for years 6-10 and,*
 - c) where possible, for years 11-15 of the plan.*
- 3.33 The term “deliverable” is now defined in the glossary to the NPPF which states that:
- “To be considered deliverable, sites for housing should be **available** now, offer a **suitable** location for development now, and be **achievable** with a realistic prospect that housing will be delivered on the site within five years.”*
- 3.34 Paragraph 68 establishes a requirement for local authorities to promote a “*good mix of sites*” including 10% of housing on sites no larger than 1 Hectare unless there are strong reasons why this cannot be achieved.
- 3.35 Paragraph 72 establishes that the supply of large numbers of new homes can often be best achieved through planning for larger scale development “*such as new settlements or significant extensions to existing*

villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities". It states that working with the support of their communities and other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way.

Rural Housing

- 3.36 Paragraph 78 of the NPPF states that in order to promote sustainable development in rural areas, housing should be located where it will *"enhance or maintain the vitality of rural communities"*. It specifically establishes that policies should *"identify opportunities for villages to grow and thrive, especially where this will support local services"*.

Green Belt

- 3.37 Paragraph 136 of the NPPF establishes that Green Belt boundaries should only be altered where *"exceptional circumstances are fully evidenced and justified"*, through the preparation or updating of plans.

- 3.38 Paragraph 137 makes it clear that before concluding that exceptional circumstances exist authorities should be able to demonstrate that *"all other reasonable options for meeting its identified need for development"* have been *"examined fully"*. It specifically states that LPAs will need to demonstrate that strategic policies:

"a) makes as much use as possible of suitable brownfield sites and underutilised land;

b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and

c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground."

4. Scope of the New Local Plan

Scope

- 4.1 The NPPF requires Local Plans to be reviewed once every five years (i.e. for a review to be completed no later than five years from adoption) and be updated as necessary in order to take into consideration changing circumstances affecting the area or any relevant changes in national policy.
- 4.2 In the light of that: strategic policies in the adopted Part 1 Plan are already four years old; there has been a change in national policy; and local authorities are now required to calculate their local housing need based on the 'standard method' it is considered appropriate for the Council to undertake an immediate, comprehensive review of local policy and prepare a new local plan.
- 4.3 The New Local Plan 'Scoping the Issues' Report confirms that the Plan will replace both parts of the adopted Stafford Borough Plan (2011-2031). It is possible that the New Local Plan review could also supersede policies in adopted Neighbourhood Plans.
- 4.4 Therefore, it is understood that the New Local Plan will be comprehensive in scope and will deal with a complete range of strategic and non-strategic issues in accordance with national policy, including:
- the overall strategy for the pattern, scale and quality of development; and
 - ensuring that sufficient provision is made to meet the identified needs for: housing, employment, retail, leisure and other commercial development.
- 4.5 Given the anticipated timescales for the preparation of the New Local Plan it will need to be prepared in accordance with and examined against the policies in the new NPPF which was published in July 2018. Therefore, it will be necessary for the New Local Plan to clarify which policies cover 'strategic' issues and which deal with 'non-strategic' matters and demonstrate that these are underpinned by relevant and up-to-date evidence.

Plan Period

- 4.6 The Council proposes that the New Local Plan will cover the period 2020 to 2040. This is a plan period of 20 years which exceeds the minimum requirement of 15 years in the NPPF. This appears to be reasonable and extends nine years beyond the end of the plan period for the adopted plan.

The Duty to Cooperate

- 4.7 Paragraph 1.7 of the 'Scoping the Issues' Report deals with the 'Duty to Cooperate' and states that the Council is working collaboratively with neighbouring authorities to ensure that the Plan takes account of cross boundary issues. It also establishes that further details will be set out in 'Statements of Common Ground' as the new Local Plan progresses.
- 4.8 The new NPPF requires all strategic policymaking authorities to prepare and maintain at least one 'Statement of Common Ground' "*throughout the plan-making process*" which documents:

1) the cross-boundary matters being addressed; and

2) progress in cooperating to address these.

4.9 A Statement of Common Ground(s) is also now required in order to demonstrate that a plan is "*sound*" (i.e. "*effective*") and ensures that strategic matters are appropriately dealt with through the plan-making process and not deferred.

4.10 No 'Statement of Common Ground' with adjoining authorities has been published alongside the initial 'Scoping the Issues' Report. We note that the consultation commenced prior to the publication of the revised NPPF. However, to accord with the requirements of national policy and ensure that strategic, cross-boundary issues are appropriately considered from an early stage in the plan-making process one or more 'Statement of Common Ground' with adjoining authorities should be published alongside subsequent stages of consultation on the New Local Plan.

5. The Need for Housing Now

- 5.1 Section 3 of the New Local Plan 'Scoping the Issues' Report deals with a range of 'Key Policy Areas'; one of these is the need for new homes.
- 5.2 The Report does not specifically comment on the likely scale of housing need to be accommodated in the Borough to 2040. However, the revised NPPF makes it clear that the new "*standard method*" in national planning guidance should be used in order to determine the "*minimum number of homes needed*", unless there are exceptional circumstances to justify an alternative approach.
- 5.3 Alongside the publication of the revised NPPF the Government confirmed, in July 2018, that it intends to review and consider adjusting the standard method in September 2018 in the light of updated household projections which are due to be published. Therefore, the minimum housing need for Stafford Borough ought to be calculated using any updated standard method published by the Government unless the Council is able to demonstrate that there are "*exceptional circumstances*" justifying an alternative approach.
- 5.4 In addition to the local housing need figure to be determined using the 'standard method' the NPPF makes it clear that any needs that cannot be met within neighbouring authority areas should be taken into account in establishing the amount of housing to be planned for. Therefore, any unmet needs arising from adjoining areas¹ should be set out in the Statement of Common Ground including matters being addressed and progress in cooperating to address these through the plan-making process.
- 5.5 The Report recognises that the Government has a strong agenda to increase the supply of housing to address the national shortage. Indeed the NPPF states that a key objective is to '*significantly boost the supply of new homes*'. It also requires Plans to be "*positively prepared*" in order to meet objectively assessed needs and be "*sufficiently flexible to adapt to rapid change*".
- 5.6 In order to provide flexibility Plans should identify sufficient deliverable and developable sites to ensure that the full objectively assessed housing needs are met within the plan period.
- 5.7 The Local Plans Expert Group (LPEG) has recommended that to boost significantly the supply of housing, in accordance with the Framework, and ensure that needs are met over the plan period, Local Plans should identify sufficient deliverable or developable sites to meet the housing requirement for the full plan period plus an additional allowance for flexibility appropriate to local circumstances. It recommends that to provide extra flexibility additional developable sites should be identified for approximately 20% of the housing requirement for a minimum fifteen year period from the date of adoption.
- 5.8 Therefore, the New Local Plan should also incorporate an appropriate 'buffer' (i.e. allocate sufficient sites to provide flexibility) to ensure that the minimum housing requirement would be met within the plan period and a five year supply of deliverable housing land would be maintained throughout the plan period.

¹ For example, a Statement of Common Ground produced between Newcastle-Under-Lyme Borough Council, Staffordshire Moorlands District Council, Stoke on Trent City Council and Stafford Borough Council in June 2018 states that Staffordshire Moorlands District has asked Stafford Borough to assist with meeting its identified **shortfall of 190 dwellings**. It also states that no request had been received from the City of Stoke-on-Trent Council or Newcastle-under Lyme Borough Council to accommodate any unmet housing needs within Stafford Borough, despite the emerging Joint Local Plan ('Preferred Options' consultation draft) identifying a **possible shortfall of over 1,200 homes**.

Housing Mix

- 5.9 Paragraph 3.17 of the Report states that the evidence base in relation to the mix and type of dwellings required in the Borough during the plan period will be updated during the plan-making process. This is supported and would accord with the requirements of the new NPPF which states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.
- 5.10 The specific questions in the 'Scoping the Issues' Report which relate to housing mix are responded to in detail in Section 7.

6. The Location for Housing Now

6.1 The NPPF requires new housing and development to be directed to the most sustainable locations which provide a variety of services and facilities and which are accessible by public transport.

6.2 The 'Scoping the Issues' Report confirms that the adopted Stafford Borough Plan directs the majority of new housing to the "Sustainable Settlement Hierarchy" at Stafford, Stone and the Key Service Villages. It also confirms that the Council intends to review the adopted settlement hierarchy and spatial strategy for the location of housing growth in the Borough. The Report is accompanied by a separate document the "New Local Plan: Settlement Assessment" paper which sets out how the Council it intends to review the settlement hierarchy. This is considered in further detail under the headings below.

Settlement Hierarchy

6.3 The Council's 'Settlement Assessment' paper establishes the proposed methodology for the review of the settlement hierarchy to inform the spatial strategy and assist in identifying sustainable locations for new development in the Borough in the New Local Plan.

6.4 As a matter of principle, the proposed review of the settlement hierarchy appears to be a logical first step in the development of the spatial strategy for the Borough and identifying sustainable locations for new development. However, it is clear that further work will be required to assess the capacity of each settlement to accommodate growth and consider the availability of 'deliverable' and 'developable' housing sites in the Borough.

6.5 The paper outlines the following broad method for identifying a settlement hierarchy for the New Local Plan:

- 1) identification all potential settlements in the Borough;
- 2) identification of a series of sustainability criteria for categorising settlements including;
 - a. population and household numbers;
 - b. relationship with the highway network;
 - c. access to employment within 3km;
 - d. availability of key services (e.g. shops, libraries, post office etc.)
 - e. accessibility of settlements by public transport;
 - f. reliance on the car; and
 - g. availability of education facilities;
- 3) identification of 'settlement categories'; and
- 4) assessment of settlements against into the categories based on the sustainability criteria.

6.6 On the basis of the analysis undertaken the paper makes a series of recommendations about the tiers of the hierarchy and how towns and villages in the Borough could be categorised into them. However, it notes that the purpose of the report is not to set a firm description of the capacity of each settlement or the likely quantum of growth to be accommodated in each settlement.

6.7 From this process the Council has identified a seven 'tier' settlement hierarchy, as follows:

Tier	Settlement Category	Description
1	Stafford	Largest urban area with a regionally significant service centre role providing employment, retail and other facilities, and a key role in driving growth.
2	Stone	Large town providing employment, retail and other facilities for a wide area
3	North Staffordshire Urban Area	These areas are located in the north of the Borough and include Trentham Gardens, Clayton, Meir Heath/Rough Close and Blythe Bridge.
4	Large Villages	Large villages of 500 or more dwellings which act as key service centres for the surrounding rural area by virtue of the range of services and facilities they possess. Eccleshall is identified as a 'large village'.
5	Medium Villages	Medium villages of 250 or more dwellings which tend to have a lesser provision of services than larger villages that share services with nearby villages
6	Small Villages	Small villages with a definable village nucleus (i.e. not dispersed Settlement Assessment – July 2018 12 villages or ribbon development) of 50 or more dwellings with fewer services available.
7	Rest of the Borough	Development elsewhere (i.e. in an area not falling into one of the above categories)

6.8 On the face of it, the emerging 'settlement hierarchy' appears to introduce a number of new tiers or categories of settlements when compared to the adopted 'Sustainable Settlement Hierarchy', including:

- the 'North Staffordshire Urban Area' – this area was not previously identified as a separate tier of the settlement hierarchy in the adopted plan despite forming part of the north Staffordshire conurbation; and
- 'Large', 'Medium' and 'Small' Villages - the adopted Plan identifies only one tier of 'sustainable' settlements (i.e. the Key Service Villages) below Stafford and Stone but acknowledges that there are number of other settlements which were not considered appropriate for inclusion in the 'Sustainable Settlement Hierarchy'.

6.9 The Settlement Assessment Paper simply categorises settlements into the 'tiers' identified. It does identify which tiers of settlements will be considered sustainable locations to accommodate significant housing

growth. It also does not consider the capacity of each settlement or the likely quantum of growth which could be accommodated in each settlement. Therefore, it is clear that there is further work required to identify which settlements are sufficiently sustainable and suitable to accommodate housing growth and their capacity for growth. This work will be essential to inform the spatial strategy and location of housing growth in the New Local Plan.

6.10 Furthermore, the vast majority of housing growth (70%) in the adopted Plan was directed to Stafford and three Strategic Development Locations (SDLs) around the town. A further 10% was directed to Stone and a single SDL to the West and South of the town. According to the Council's latest 'Land for New Homes Housing Monitor' (2018) the 'North of Stafford' and 'West of Stafford' SDLs are unlikely to be delivered in full until the end of the current plan period (i.e. 2031) or beyond. Therefore, the new Local Plan will need to consider carefully whether:

- there is suitable land around Stafford and Stone which is available now that would not be reliant on the long-term delivery of the SUEs;
- the allocation of further land around Stafford and Stone would impact on or compromise the delivery of the existing SDLs; and
- if a greater proportion of the housing requirement needs to be accommodated at the 'Larger Villages' (e.g. Eccleshall) which have the capacity to deliver additional housing growth in the plan period without being reliant on or impacting on the delivery of the existing SDLs.

Eccleshall

6.11 Eccleshall is identified as one of a number of 'Large Villages' identified in the 'Settlement Assessment' paper. However, it is the only 'Large Village' which is also described as a 'main settlement' (along with Stafford and Stone) which have a range of retail, employment, education and community services. Accessibility to 'main settlements' is identified as an important sustainability consideration for the purpose of assessing the accessibility of the other settlements.

6.12 This suggests that: 1) Eccleshall supports a greater range of services than any of the other 'Large Villages' which are not defined as 'main settlements' and 2) is a more sustainable location for housing growth than the other 'Large Villages'. It should therefore be identified as a separate tier of settlement between 'Stone' and the other 'Large Villages'.

6.13 The NPPF supports the delivery of housing in locations which would "*enhance or maintain the vitality of rural communities*" and states that policies should "*identify opportunities for villages to grow and thrive, especially where this will support local services*". It is considered the land promoted by Taylor Wimpey for residential development on the edge of Eccleshall would provide a sustainable opportunity to deliver housing which would: allow the village to grow, sustain and enhance local services and improve the vitality of the village community.

Potential Garden Settlement

- 6.14 Alongside a review of the settlement hierarchy, the 'Settlement Assessment' paper notes that the New Local Plan will consider whether there should be a new 'garden settlement' on former Ministry of Defence (MoD) land near to Swynerton for substantial housing and employment development. However, the paper notes that this is only at "*concept stage*" and is entirely dependent on a number of factors including:
- HS2 (the Borough Council is currently petitioning for a series of changes to the High Speed Rail (West Midlands - Crewe) Bill);
 - a new motorway junction from the M6 at Stone; and
 - the MoD releasing the land for development (i.e. confirmation that the land is available).
- 6.15 Therefore, at this stage, there appears to be significant uncertainty whether a new garden settlement in this location would be "*deliverable*" in the plan period in accordance with the requirements of the NPPF.
- 6.16 Even if the a new garden settlement is in due course demonstrated to be a deliverable and sustainable option for the delivery of housing, the NPPF makes it clear that local authorities should identify a "*mix of sites*" to deliver housing. In particular it recognises that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. In which case, a mix of site allocations would be particularly important to avoid overreliance on the delivery of a single new settlement which would be dependent on the provision of strategic infrastructure (including HS2 Phase 2a which is not expected to be complete until 2027) and have a long 'lead-in' period before it would start to deliver significant housing.
- 6.17 If the land promoted by Talyor Wimpey at Eccleshall is allocated for residential development in the New Local Plan there is a realistic prospect of housing being delivered on the site within five years and the site would almost certainly contribute to supply during the plan period.

7. Other Questions

7.1 The 'Scoping the Issues' Report asks a series of questions to assist in scoping the issues and developing the new Local Plan.

7.2 A number of these questions are of relevance to the provision of new housing in the Borough and are responded to in the paragraphs below.

Question 4. How could the new Local Plan support local villages and their communities to grow and thrive?

7.3 The NPPF supports the delivery of housing in locations which would "enhance or maintain the vitality of rural communities". This could be achieved through the direction of a greater proportion of the overall housing needed in the Borough to the most sustainable villages which have existing services and facilities, good access to public transport and have the greatest capacity for growth.

7.4 Moreover, whilst it will be necessary for a mix of site sizes to be allocated to meet the housing requirement, to ensure that new housing will help to support village communities to grow and thrive it will be necessary to ensure that allocations are of an appropriate scale and are capable of supporting improvements to facilities and infrastructure and generating an increase in population which would support the viability of existing services.

7.5 The land promoted by Taylor Wimpey for residential development would provide a sustainable opportunity to deliver housing growth which would: allow the village to grow; support local services and enhance the vitality of the village community. It is of sufficient scale that the development of the site could make appropriate contributions to improve or expand existing services and infrastructure in the village. It would also provide a range of housing (including affordable housing) which would assist in diversifying the village (e.g. through the introduction of family housing and smaller properties suitable for first time buyers).

Question 5. Do you consider that the new Local Plan should set out a range of densities for the Borough and if so, are there any specific locations?

7.6 Paragraph 123 of the NPPF states that where there is an anticipated shortage of land to meet identified housing needs, it is especially important that policies avoid development at low densities, and ensure that developments make optimal use of the potential of each site. In these circumstances, it states that plans should contain minimum density standards for city and town centres and other locations that are well served by public transport. It also states that the use of minimum density standards should also be considered for other parts of the plan area and that it may be appropriate to identify a 'range' of densities that reflect the accessibility and potential of different areas.

7.7 Therefore, as a matter of principle, Taylor Wimpey would support the use of a range of minimum densities for housing development in different areas of the Borough. However, any such policies would need to have regard to accessibility and other considerations such as local character, market conditions and other technical considerations.

Question 6. National policy states that the Council should prioritise the development of redundant brownfield sites that have good access to existing services for new housing. What should the Council look to do if it cannot find enough suitable brownfield sites to meet its housing and employment needs?

7.8 If the Council is unable to identify sufficient 'deliverable' brownfield sites to meet its housing and employment needs through the SHLAA and Brownfield Register (accounting for any minimum density standards) it should then look to 'deliverable' greenfield land in the most sustainable locations for housing and employment in the Borough outside of the Green Belt (e.g. adjacent to sustainable settlements such as Eccleshall).

7.9 If there is insufficient suitable greenfield land in suitable locations beyond the Green Belt, the Council should consider the release of land from the Green Belt. This approach would accord with paragraph 136 of the NPPF which requires all reasonable options to be examined fully before considering the release of Green Belt land.

Question 7. What types of housing do you think will be most needed in the Borough over the coming years?

7.10 A range of housing of housing types, sizes and tenures will be required during the plan period.

7.11 The 'Scoping the Issues' Report confirms that the Council's evidence base in relation to the mix and type of dwellings required in the Borough will be updated. This would accord with the requirements of the new NPPF which states that within the context of the local identified housing need the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.

Question 8. The new Local Plan could seek that a percentage of large sites (e.g. over 20 dwellings or more) should be made available for self-build. What are your thoughts on this, and if you are supportive, what percentage should be made available for dwelling plots?

7.12 Under section 1 of the Self Build and Custom Housebuilding Act 2015, local authorities are required to keep a register of those seeking to acquire serviced plots in the area for self-build and custom house building. Paragraph 61 of the NPPF requires local authorities to assess the 'demand' for self-build or custom-build homes. Therefore, any policy related to self-build plots should clearly be informed and led by market demand.

7.13 An blanket policy requiring all sites of 20 dwellings or more to provide a proportion of self-build homes is likely to be unduly onerous and restrictive, particularly if it is not based on evidence of demand. Such a policy would not be "justified" or "effective" and would have the potential to delay or prevent the delivery of other market and affordable housing in the Borough.

Question 18. What new educational facilities do you think are needed, and where in the Borough are these required to support existing and new communities?

7.14 If necessary and justified, the land being promoted by Taylor Wimpey at Eccleshall could make appropriate contributions towards additional education capacity in the village in order to accommodate pupils generated by the development.

Question 19

a) What new health, social and community facilities do you think are needed in the Borough to support both new and existing communities?

b) Where should these be located/ go?

7.15 If necessary and justified, the land being promoted by Taylor Wimpey at Eccleshall could make appropriate contributions towards improvements to health and community in the village to accommodate the needs of potential residents of the site.

Question 29. The NPPF states that Green Belt boundaries should only be reviewed in exceptional circumstances through the preparation of the Local Plan. Less than a quarter of the Borough is covered by Green Belt. Do you consider review is necessary?

7.16 A review of Green Belt boundaries to accommodate new development should be undertaken if the Council is unable to identify sufficient 'deliverable' and 'developable' 'non-Green Belt' land through the SHLAA and Brownfield Register in sustainable locations to meet its identified housing and employment needs having regard to the requirements of paragraph 137 of the NPPF. It would be necessary to fully demonstrate that 'exceptional circumstances' exist for the release of land from the Green Belt.

8. Merits of the Site

8.1 As set out above, Taylor Wimpey is promoting approximately 11 hectares of greenfield land on the edge of Eccleshall for residential development in the emerging Local Plan. The paragraphs below examine the planning merits of the site and confirm that it is a sustainable and deliverable option for the delivery of housing growth in the Borough.

Deliverability

8.2 The Glossary of the NPPF (2018) establishes that, in order to be deliverable, sites should be:

- **available** now;
- offer a **suitable** location for development now; and
- be **achievable** with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable.

8.3 The Planning Practice Guidance (PPG)² states that sites can be considered deliverable if there are “*no significant constraints (eg infrastructure) to overcome ... can be considered capable of being delivered within a 5-year timeframe.*”

8.4 The PPG also recognises that site size is an important factor and plan makers will need to consider “*the time it will take to commence development on site and build out rates to ensure a robust 5-year housing supply.*”

Availability

8.1 The PPG³ states that a site is:

“considered available for development, when, on the best information available...there is confidence that there are no legal or ownership problems... land is controlled by a developer or landowner who has expressed an intention to develop, or ... to sell...”.

8.2 The site is currently in dual ownership. Taylor Wimpey has recently agreed terms with the landowners to promote the site through the Local Plan Review process.

8.3 This confirms not only that the landowners are willing sellers, but also that the future development of the site will be in the hands of a very experienced and successful national house builder, which will be capable of securing planning permission and delivering housing quickly assuming that the site is allocated for housing in due course.

8.4 Indeed Taylor Wimpey is currently constructing housing on the adjacent Overton Manor site. Therefore, Taylor Wimpey has a good track record of delivering housing in the village. It has also established successful relationships with the community and understands the local area well.

² PPG 5.6 Paragraph: 031 Reference ID: 3-031-20140306

³ PPG Paragraph: 020 Reference ID: 3-020-20140306

8.5 There is no legal ownership or other technical impediments. Accordingly, the site is available now in NPPF terms

Suitability

8.6 The PPG confirms that assessing the suitability of sites for development should be guided by:

- *“the development plan, emerging plan policy and national policy;*
- *market and industry requirements in that housing market or functional economic market area.”*

8.7 It confirms that when assessing sites against the adopted development plan, plan makers should *“take account of how up to date the plan policies are and consider the appropriateness of identified constraints on sites/broad location and whether such constraints may be overcome.”*

8.8 Detailed sub-criteria for assessing the suitability of sites are also set out in the PPG⁴. It confirms that a number of factors should be considered when assessing a site’s suitability for development, including:

- *“physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;*
- *potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation;*
- *appropriateness and likely market attractiveness for the type of development proposed;*
- *contribution to regeneration priority areas;*
- *environmental/amenity impacts experienced by would be occupiers and neighbouring areas.”*

Consistency with Policy

8.9 The site is in a sustainable location, immediately adjacent and very well-related to the existing built-up area of the small town / large village of Eccleshall. The site is located within walking distance of a range of amenities in the village centre and is accessible to public transport. There are regular bus services to Stafford Town Centre and Hanley.

8.10 Eccleshall is approximately 11 kilometres from a range of services, facilities and employment opportunities in Stafford via the A5013.

8.11 The adopted Plan identifies Eccleshall as a ‘Key Service Village’ which is one of the more sustainable locations for housing, employment and service provision in the Borough after the main towns of Stafford and Stone. It is also the only ‘Key Service Village’ with its own defined ‘Local Centre (i.e. a more substantial retail offer than any of the other Key Service Villages).

⁴ PPG Paragraph: 019 Reference ID: 3-019-20140306

- 8.12 The adopted Stafford Borough Plan acknowledges that the settlement has a significant level of services and facilities for a relatively small population. It is also located in close proximity to the Raleigh Hall Recognised Industrial Estate which is earmarked for expansion in the adopted Plan and provides employment opportunities within 2 kilometres of the site.
- 8.13 The village contains a comprehensive range of services and facilities including:
- a Primary School
 - a GP Surgery;
 - a Community Centre and Pre-School;
 - a dentists;
 - a Co-operative foodstore;
 - a library;
 - a butchers;
 - a cricket club;
 - an off-license;
 - churches;
 - a post office;
 - public houses;
 - a pharmacy;
 - takeaways, cafes and restaurants;
and
 - hair salons;
 - comparison retail shops.
 - a florists;
- 8.14 Therefore, the site is a sustainable location for housing growth. Approximately 20% of the Borough comprises land in the Green Belt. Eccleshall is not constrained by the Green Belt unlike a number of the other Key Services Villages (i.e. Barlaston, Tittensor and Yarnfield). It is, therefore, one of seven 'Key Service Villages' which are located beyond the Green Belt.
- 8.15 The site has a total area of approximately 11 hectares. If an average density of 30 dwellings per hectare is applied the entire site would have the capacity for up to approximately 330 dwellings. However, approximately 5.5 hectares of the site is located within the Eccleshall Conservation Area. Therefore, it is likely that the capacity of the site will be lower than 330 dwellings and is more likely to be in the region of around **200 to 250 dwellings** subject to the outcome of further heritage advice.
- 8.16 There were 1,320 households in Eccleshall at the time of the last census in 2011. The Neighbourhood Plan suggests that approximately 325 new homes could be accommodated on land in defined the settlement boundary. Therefore, an additional approximately 250 homes on land north of Shaws Lane would result in only a 15% increase in the number of households which would not put undue pressure on existing infrastructure. If necessary, development of this scale could also support improvements to or expansion of infrastructure in the village.
- 8.17 It is, therefore, considered that development of the site, as whole, is a suitable, sustainable option which would provide a valuable source of sustainable housing land in the District which would have the potential to make contributions towards and support improvements to facilities and services in the village.

8.18 It could also provide a range of other benefits including:

- a mix of house types (e.g. smaller starter homes and larger family homes);
- a contribution towards the need for affordable housing;
- a high quality development which respects the character and setting of the village;
- the retention of natural features (particularly mature trees and hedgerows);
- on-site public open space to potentially include elements such as children's play equipment;
- additional spending capacity and creation of a more balanced age profile in the village to support local businesses;
- increased patronage of local services and facilities to support their vitality, viability and long-term sustainability;
- jobs during the construction phase of development;
- revenue from the New Homes Bonus and Council Tax;
- other financial contributions, which might be towards improvements to local services and infrastructure and other initiatives pursued by the Parish Council.

Other Technical Matters

Flood Risk

8.19 According to the Environment Agency Flood Risk Map the site is located entirely within Flood Zone 1 (i.e. at low risk of flooding from rivers and the sea).

8.20 The Staffordshire Strategic Flood Risk Assessment (2014) also appears to indicate that the site has not been subject to any historic flooding and is at low or no risk of flooding from other sources (e.g. surface water, reservoirs or groundwater).

8.21 Therefore, flood risk and drainage does not represent a significant constraint to development.

8.22 In due course, Taylor Wimpey will instruct a specialist flood risk and drainage consultant to produce a Flood Risk Assessment and outline drainage strategy for the site.

Ecology and Trees

8.23 The site comprises open agricultural land. A review of the 'MAGIC' maps indicates that the site and adjoining land is not subject to any ecological designations. The nearest designated site is the Cop Mere SSSI which is approximately 1.9 kilometres from the site. Due to the intervening distance it is considered unlikely that residential development of the site would have an adverse impact on designated sites.

8.24 There are some ponds in the centre of the site and a number of trees and hedgerows. Several of the trees along the eastern boundary of the site are covered by a Tree Preservation Order and trees in the northern part of the site are protected by virtue of their location in a Conservation Area. However, the majority of these features are located along the site boundaries and development proposals should be able to avoid the removal of or significant impacts on trees.

8.25 Taylor Wimpey will, in due course, be undertaking a Phase 1 Ecological Appraisal of the site and Tree Survey which can be provided to the Council. However, on the basis of the information available at current, it is unlikely that ecology or arboriculture will be a significant constraint to residential development on the site.

Heritage and Archaeology

8.26 The northern part of the site is located within the Eccleshall Conservation Area. There are also a small number of statutorily listed buildings immediately to the north of the site.

8.27 The Council's Conservation Area Appraisal identifies the following as key elements of the 'special character' of the Conservation Area:

- a busy market town with surviving architectural and landscape features that represent Eccleshall's roots in farming, the leather trade, the market, and its Ecclesiastical importance;
- sixty one listed buildings including a church dating to the 13th century, and ancient castle site, also a scheduled monument;
- a well-preserved, ancient green space, Town Meadow (to the north of High Street);
- tall Georgian fronted buildings in dense plots on High Street, disguising buildings with much earlier origins;
- a well-preserved street pattern, lanes and burgage plots;
- an uninterrupted building line creating a visual flow along High Street, emphasised by lintels and cills and punctuated with pediments and chimneys;
- a variety of historic windows, including canted bay windows over two storeys, and 18th-19th century sashes;
- a wealth of 19th century shopfronts rich in architectural detail; and
- a number of surviving cart entrances with surviving historic paving.

8.28 The site comprises of open agricultural land which does not have any public access. The vast majority of the site is not visible from Church Street as it is set behind residential properties and a mature dense hedgerow. Due to topography there is also no inter-visibility between the statutory listed property immediately adjacent to the north west corner of the site. Therefore, it is not clear how the site makes any contribution to the overall character and appearance and, therefore, significance of the Conservation Area.

8.29 Taylor Wimpey will, in due course, be appointing a specialist heritage consultant to undertake an assessment of the significance of designated heritage assets within and adjacent to the site. This will enable a better understanding of the extent to which the Conservation Area designation and setting of nearby listed buildings might be a constraint to development in the northern part of the site and the capacity of the site, as a whole.

8.30 However, at this stage, it is considered unlikely that heritage would represent an unsurmountable constraint to residential development of the site and the southern portion of the site, in particular which lies outside the designated Conservation Area and come distance from designated heritage assets.

Highways and Access

8.31 The site is currently accessed from Shaws' Lane. Taylor Wimpey has taken highways advice from a specialist transportation consultant, Curtins, who has advised that suitable access for the site in residential use could be taken from Shaws' Lane.

8.32 The site is accessible to a range of facilities in the village centre via Shaws' Lane and Church Street to the north. It is also within walking distance of bus stops in the village which provide regular services to Stafford town centre and Hanley. It is also within 2 kilometres of the Raleigh Hall Recognised Industrial Estate.

8.33 Taylor Wimpey is taking further advice from Curtins in order to demonstrate that the residential development of the site for approximately 250 dwellings would not have an unacceptable adverse impact on the operation of the highways network.

8.34 Therefore, highways and access is not considered a constraint to development.

Loss of Agricultural Land

8.35 The Natural England Agricultural Land Classification Maps appear to identify the site as Grade 3 "good to moderate" agricultural land. It is not clear whether the site comprises Grade 3a (i.e. best and most versatile agricultural land) or Grade 3b agricultural land. However, the site would be significantly below the threshold (20Ha) for Natural England to be consulted on planning applications which involve the loss of agricultural land. Therefore, agricultural land is not a significant constraint to the development of the site.

Services and Utilities

8.36 Electricity poles and cabling pass through part of the site. It is understood that these are low voltage electricity lines which could be buried underground as part of the development.

8.37 It is also understood that connections to existing services and utilities could be extended to serve the site.

8.38 Taylor Wimpey will, in due course, be appointing a specialist utilities consultant to undertake an assessment of the significance of designated heritage assets within and adjacent to the site. This will enable a better understanding of the extent to which the Conservation Area designation might be a constraint to development in the northern part of the site and the capacity of the site, as a whole.

Other Matters

8.39 Taylor Wimpey will shortly be obtaining a range of other detailed technical work including in work relating to ground conditions and landscape and visual impacts.

8.40 It is considered that there are no technical constraints that would prevent the development of the site for approximately 200 to 250 dwellings.

Achievability

8.41 The site is available now. Assuming that the site is allocated for residential development through the Local Plan Review a planning application could be submitted for the residential development of the site very quickly.

8.42 Taylor Wimpey would be able to start to deliver housing on site shortly after the grant of planning permission and immediately following site preparation works and the discharge of any relevant planning conditions.

8.43 Therefore, there is a realistic prospect of housing being delivered on the site within five years.

8.44 As set out above, there are no significant site constraints that might prevent development or make the development unviable. Therefore, the development of the entire site is viable.

8.45 For the reasons set out above, the entire site is available, suitable, and achievable and is, therefore, **deliverable**.

9. Summary of Key Matters

9.1 A summary of the key matters set out in this report is as follows:-

- A comprehensive review of the Local Plan is considered necessary in accordance with the national requirement for strategic policies to be reviewed and updated as necessary at least once every five years.
- The plan period proposed by the Council (i.e. 2020 – 2040) appears to be appropriate for the New Local Plan.
- The New Local Plan will need to be prepared in accordance with the requirements of the revised NPPF which was published in July 2018. The following will need to be undertaken in accordance with the requirements of national policy:
 - the assessment of housing needs, including the mix and type of housing required;
 - the consideration of strategic cross-boundary matters - to ensure that these are addressed and not deferred; and
 - the identification of a sufficient supply and mix of 'deliverable' housing sites of a range of sizes to ensure that the full housing need is delivered in the plan period.
- In addition, in accordance with the requirements of the revised NPPF it will be necessary to demonstrate that all other reasonable options for meeting the identified development needs have been fully examined before undertaking a review of Green Belt boundaries in the Borough.
- The principle of a review of the adopted settlement hierarchy and spatial strategy for the delivery of growth in the Borough is supported. However, further work is required to: identify which settlements are sufficiently sustainable and suitable to accommodate housing growth; and assess their capacity for growth.
- Eccleshall is sustainable location with the capacity to accommodate additional housing growth in the New Local Plan. It is the most sustainable settlement after the main towns of Stafford and Stone and should have its own separate tier in the settlement hierarchy above the other 'large villages'.
- We conclude that the direction of additional housing development to sites of an appropriate scale in Eccleshall would enhance the vitality of the village community and assist it to continue to thrive by supporting the viability of local services and facilities.
- The land to the north of Shaw's Lane which is being promoted for residential development by Taylor Wimpey is available, suitable and achievable and is, therefore, deliverable in accordance with the Framework. No adverse impacts would be generated by allocating the site for housing and the level of development contemplated would not put undue pressure on existing infrastructure.

- The development of the entire site would offer substantial benefits and its allocation in the New Local Plan would represent a positive response to the NPPF requirement to 'significantly boost' housing delivery.

GVA

September 2018

Appendix 1

Site Location Plan



Appendix 2

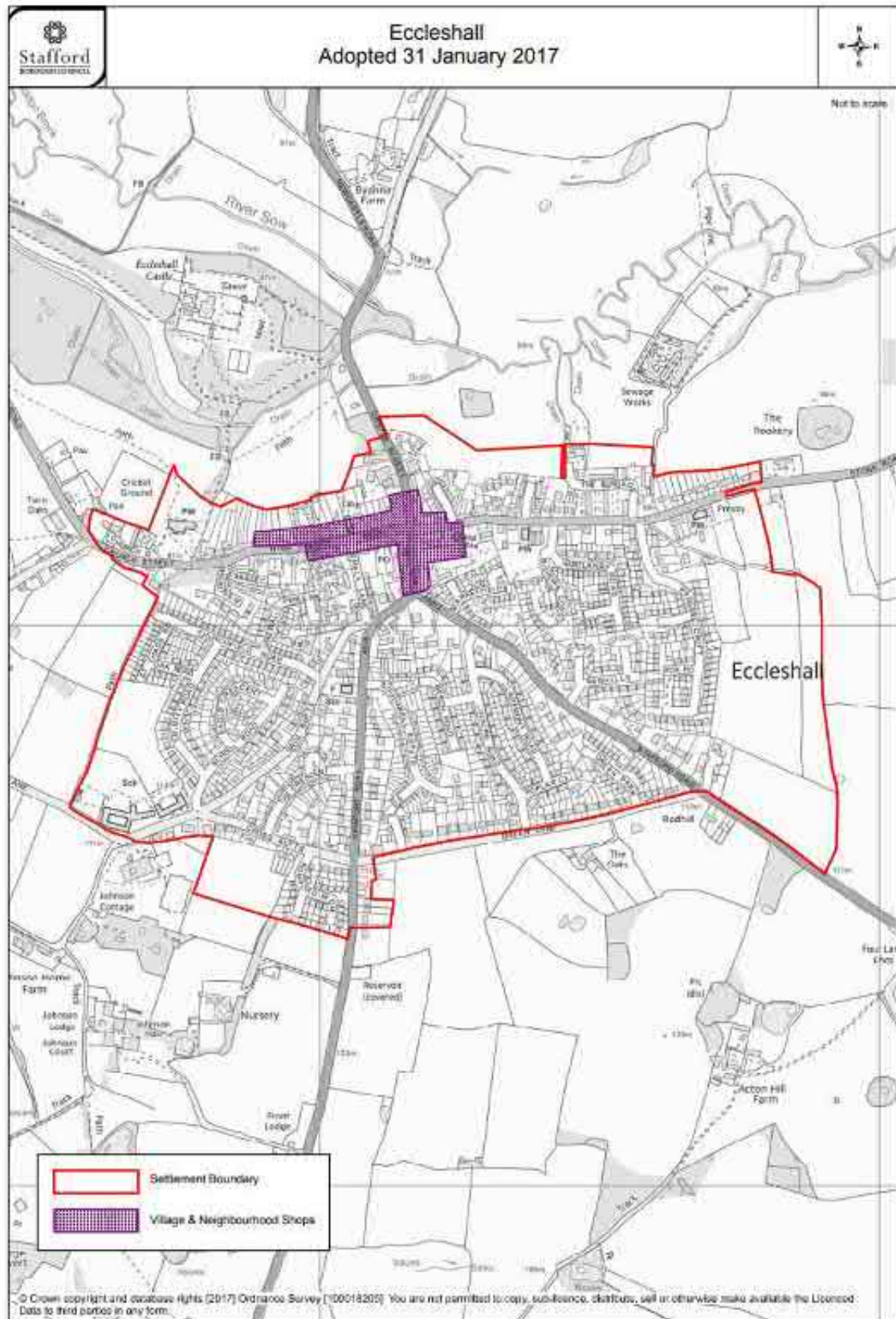
Aerial Photo



(Google Maps, 2018)

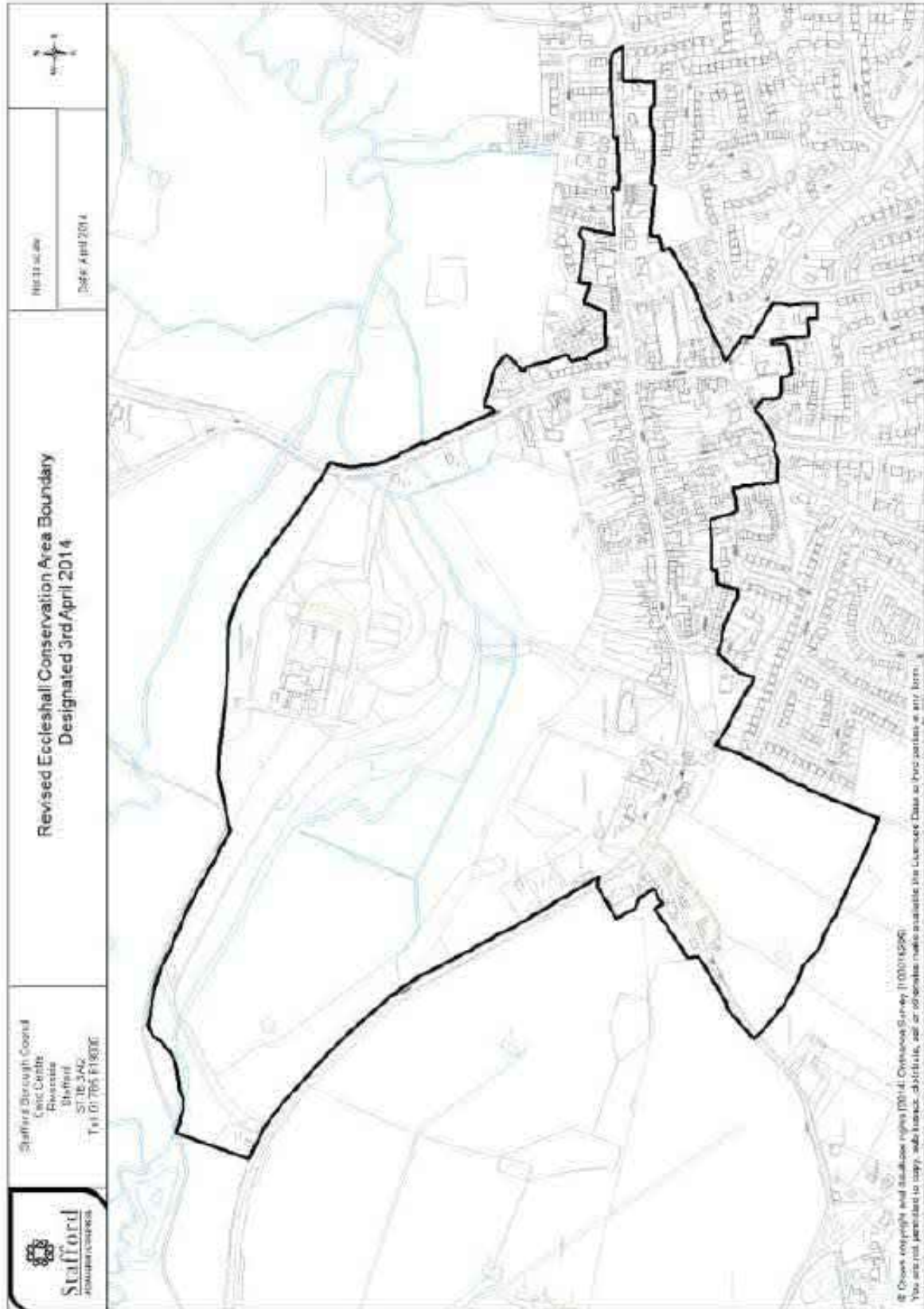
Appendix 3

Proposals Map



Appendix 4

Conservation Area Boundary



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Appendix IV

Aerial Photo



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