

Appendix 1 - Consultation Responses Organised by Question

Contained within this appendix are the responses to each of the questions asked in the Scoping the Issues consultation (by clicking on the following links you will jump to that section in the appendix).

Question List:

- [Question 1: What would you like the Borough to be like in the future?](#)
- [Question 2: What do you think should be the key economic, housing, environmental, social, community and health outcomes that the Local Plan should help to deliver?](#)
- [Question 3: Policies in the Local Plan can seem very high level but at their heart they are all about creating better places to live, work and play. What would you change in your local neighbourhood to make it a better place to live?](#)
- [Question 4: How could the new Local Plan support local villages and their communities to grow and thrive?](#)
- [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?](#)
- [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?](#)
- [Question 7: National policy encourages Local Plans to plan positively for a mix of housing, based on the demographic of people that live in the Borough both now, and the expected future population. What types of housing do you think will be most needed in the Borough over the coming years?](#)
- [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?](#)
- [Question 9: National policy states that the Council should prioritise the development of redundant brownfield sites that have good access to existing services for new housing which includes pitches for gypsies, travellers and travelling show people. Where should the Council look for suitable brownfield sites for new pitches?](#)
- [Question 10: What are the main barriers to growth that need to be addressed in the Local Plan to ensure that all sections of the community have access to the benefits of future employment creation in the Borough?](#)
- [Question 11: Do you think there is a need to identify additional land for employment and if so what types of employment uses should the Local Plan support and promote?](#)
- [Question 12: What do you think are the key challenges facing the Borough's town, village, and neighbourhood centres and how can the Local Plan maintain and enhance their role?](#)
- [Question 13: What improvements would you like to see in those centres that you visit regularly? Should additional uses be supported other than retail such as residential, entertainment and restaurants? Please state the name of the centre in your response.](#)
- [Question 14: What are the best locations for new retail and leisure development in the Borough and how can future development be harnessed to support the delivery of wider regeneration and economic growth needs and objectives?](#)
- [Question 15: Is there a need for the development of retail, leisure and other town centres uses in locations outside the existing established retail centres, and if so, where?](#)
- [Question 16: What new sport and leisure facilities do you think are needed in the Borough to support existing and new communities?](#)
- [Question 17: National policy gives councils new powers to protect valued open spaces by designating them as Local Green Spaces. Are there any open spaces that are special to your local community which should be designated? If yes, please provide details of the open space, its location and the reason why it is special to you and your community.](#)
- [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?](#)
- [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?](#)
- [Question 20: What approach could the Local Plan take to ensure that issues relating to pollution and air quality are minimised?](#)
- [Question 21: There is a growing need to deliver the infrastructure required to support sustainable transport choices. What could the Plan do to help you make more sustainable transport choices?](#)

- [Question 22: Are there any specific sustainable transport projects that the Council should be promoting as part of the Local Plan? If yes, please provide some detail about the project.](#)
- [Question 23: What economic development opportunities do you consider could arise from HS2 for the Borough?](#)
- [Question 24: Are there any specific transportation projects that the Council should be promoting in the Local Plan? If yes, please provide some detail on the project, its location and the reason why you believe it is necessary.](#)
- [Question 25: National policy reinforces good design as a key aspect of sustainable development and provides support to ensure high standards of design generally. Should closer ties with the local design panel be established to provide assessment and support for major or particularly complex or sensitive development proposals?](#)
- [Question 26: What could the Plan do to protect and enhance the Borough's Heritage Assets?](#)
- [Question 27: What approach should the Local Plan take to ensure that Borough's landscape, AONB and its key features are protected and enhanced?](#)
- [Question 28: What approach should the Local Plan take to ensure that Borough's natural assets are protected and where possible enhanced?](#)
- [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?](#)
- [Question 30: Which renewable technologies do you think are most suitable for development in the Borough? Please provide additional information as to why you deem these to be suitable.](#)
- [Question 31: This document sets out the issues that need to be addressed through the new Local Plan. There may be matters that have been missed or that are not covered by the other consultation questions. Are there any matters you think also need to be considered at this stage and why?](#)
- [General Responses](#)

Question 1: What would you like the Borough to be like in the future?

Response Reference	Full name of respondent	Comments
3	Bramall, S.	<p>Aspire to better quality in terms of architectural design and landscaping. Developers seem to get away with low standards in the borough compared to elsewhere in the county.</p> <p>Improved accessibility and provision for pedestrians, disabled and elderly, and tourists.</p> <p>More independent retailers in a more attractive town centre. As the County town, we compare poorly with the likes of Chester and Shrewsbury – the uninspiring chain shops will never make Stafford a shopping destination.</p> <p>Attract entrepreneurs and high-skilled staff with high-speed broadband (not just FTTC), ‘grand design homes’</p> <p>Strong rural communities that have capacity for elderly to remain in their community as well as young people.</p>
4	Historic England	<p>Our overall vision and expectations for the Local Plan with respect to the future ‘vision’ for the borough would be one in which;</p> <ul style="list-style-type: none"> • The heritage of the area is well understood as a result of a robust evidence base in line with our guidance (see above), including; the particular characteristics and significance of heritage assets in the area, the contribution they make to quality of life and other local plan objectives, the issues facing them now and in the future, and the positive opportunities they represent. • There is a positive strategy for the conservation and enhancement of the historic environment, taking into account the local characteristics, significance, contribution, issues and opportunities found in the evidence base (see above). This would include a dedicated strategic policy for the conservation and enhancement of the historic environment, robust development management policies for heritage sites and careful consideration of site allocations with associated site policies. • Is in line with our advice notes provided in in the ‘broad advice’ section above.
12	Theatres Trust	<p>It is not within the Trust’s remit to comment on the wider aspects of sustainable development or strengths of the local area, but Stafford and also other settlements within the Council’s boundary contain a number of valued cultural facilities. The Trust has recently commented on proposals for a new arts centre in Stafford and community theatre in Stone. We suggest that the Plan’s vision and objectives make reference to the strength of the area’s cultural offer, and that the Plan seeks to protect the facilities that are valued by local people as well as promote new and enhanced facilities where there is a need. In particular, a strong cultural offer will become increasingly important in supporting the health and vitality of town centres so there is scope for culture to be referenced within that context.</p>
23	Eccleshall Parish Council	<p>The Parish Council identified the need to ensure the regeneration of the North end of Stafford town centre, to ensure it is more vibrant with occupation of empty properties.</p>
36	Ingestre with Tixall Parish Council	<p>We note that there is a need for more bungalows to be built for older people downsizing with good public transport to the town and local hospitals.</p> <p>There should be no more development to the east of Stafford until a replacement for the previous Eastern Distributor road to M6 is completed.</p>
37	Knights on behalf of Birch House Lane Industrial Estate	<p>To be aspirational in terms of its aims to deliver the necessary amount of new housing and employment in appropriate locations to serve all aspects of the Borough’s population.</p>
44	Colwich Parish Council	<p>The Council would like the Borough to have a similar mix of housing and industrial estates as at present. Any new development should be matched equally with infrastructure to support it. The Borough should preserve a high quality countryside, e.g. with high biodiversity. The Borough should respect the existing adopted Neighbourhood Plan.</p>
46	Stephen Locke Associates on behalf of landowners	<p>We agree with the Stafford Borough Council’s objectives for the borough to become an even greater place of opportunity, enterprise and excellence. It is important that the borough continues to work with local partners to provide for future local needs for homes, employment and business sites, while protecting the most valuable countryside and maintaining a high quality of life.</p> <p>This should be achieved through the delivery of sustainable development through social, economic and environmental objectives through a plan-based approach.</p> <p>The National Planning Policy Framework seeks to direct development to the most sustainable locations. These are the places which are easily accessible and have a variety of services and community facilities.</p>
50	Staffordshire Wildlife Trust (SWT)	<p>We would like to see the Borough lead on green infrastructure and biodiversity enhancement, delivering measurable outcomes and enhancing the green resources of the area. We would like to see developments, such as Redhill Business Park, that protect and improve the habitats and species within them, provide high quality green spaces, water management and access for residents and employees, become the norm.</p>
53	Wardell Armstrong on behalf of Dean Lewis Estates	<p>The purpose of the new Local Plan should be to set out a new vision for the development of the Borough, highlighting the key issues to be addressed, setting the objectives to guide new growth and policies to make sure that new development meets local needs in line with national policy set out the National Planning Policy Framework (NPPF).</p> <p>Dean Lewis Estates consider that the by 2040 Stafford Borough will have (amongst other things):</p> <p>Delivered new development, where possible through the re-use of brownfield land and land not of high environmental value, in sustainable locations at Stafford, Stone and the Borough’s selected villages including a major brownfield regeneration opportunity at Cold Meece;</p> <p>By 2040 the Borough’s Villages will have:</p> <p>Delivered a range of new housing at selected villages to provide for the objectively assessed needs of the borough and, where possible, ensured that brownfield regeneration opportunities are maximised;</p> <p>Avoided development in areas that are the subject of national environmental designations.</p>

Response Reference	Full name of respondent	Comments
		Increased the availability of accessible and enhanced high-quality services and facilities, including public transport provision; Provided new green infrastructure / biodiversity enhancement schemes; Supported a diverse and regenerated rural economy by ensuring the delivery of new homes close to key employment corridors, in particular at Cold Meece;
54	Lefroy, J. MP	<ul style="list-style-type: none"> • A clean and green Borough which introduces a Green Belt between Stafford and Stone, and possibly elsewhere, to mark clear limits to development. • A Borough which supports the growth of locally owned businesses as well as encouraging inward investment. • A forward-looking Borough, setting up a 'jobs and livelihoods forum' to ensure that we are well-paced to meet the challenges and take up the opportunities of the Fourth Industrial Revolution. This forum should be focused and include private, public and voluntary sectors. • A good place for children to grow up. We need further to improve sports facilities and revive community young people's clubs where they do not exist. • A place which tackles loneliness, in particular among older people. • A Borough which values physical and mental health and places emphasis on prevention as well as cure. • A Borough in which no-one sleeps rough. • A Borough which promotes clean transport, and encourages walking, cycling and public transport use.
62	Knights on behalf of Jonathan Lloyd Developments Ltd	To be a vibrant, modern, forward thinking Borough featuring a good number, range and variety of sustainable, accessible settlements within which local people can live and work and in turn deliver a high quality of life for residents in and around the Borough. As part of the above, to accommodate/offer a wide variety of types of housing and employment opportunities, as it is considered that a greater diversity in these respects - including in relation to both the types and locations of housing and employment and any enhancements to infrastructure and/or community facilities that can be achieved as part of such developments - would enhance the sustainability of the Borough, its prosperity and ultimately the environment and quality of life of local people.
66	Natural England	The revised NPPF provides a platform for a range of local plan policy measures dealing with the natural environment and the positive interrelationship with human health and the economy. Key changes to the NPPF which we anticipate working with the Council to explore further and deliver, as appropriate, include: <ul style="list-style-type: none"> • strengthened policies on biodiversity net gain and encouraging opportunities to achieve net environmental gains • the treatment of green infrastructure as a strategic policy area • stronger protection for ancient woodland, ancient and veteran trees • the scale and extent of development within National Parks and AONBs should be limited
67	Hopton and Coton Parish Council	The Council would like the Borough to have a similar mix of housing and industrial estates as at present. Any new development should be matched equally with infrastructure to support it. The Borough should preserve a high quality countryside, e.g. with high biodiversity.

Question 2: What do you think should be the key economic, housing, environmental, social, community and health outcomes that the Local Plan should help to deliver?

Response Reference	Full name of respondent	Comments
3	Bramall, S.	<p>Economic –</p> <ul style="list-style-type: none"> - High speed broadband and mobile phone coverage– why is the borough so left behind? - More parking at the station and signage on the approach from motorway to say which car parks have capacity – there is no use shaving 15 mins of train journey with HS2 if you have to add 15 mins to find a parking space. - Housing policy needs to encourage self-build/ designer homes to attract high-flyers. Stafford has a reputation for saying “no, no, no ...” compared to Shropshire and Cheshire which recognise the benefits of attracting entrepreneurs and affluent residents to create jobs. <p>Housing –</p> <ul style="list-style-type: none"> - Deliver attractive, high-quality, individual, sustainable, lifetime homes that people of all ages desire – not just soulless identikit developments for first-time-buyers, young families. - Ensure provision of lifetime homes/bungalows to accommodate the aging population or disabled for longer in their own homes – this will have a long-term benefit in reducing care costs. - Take a positive approach to individual infil plots and encourage their use for bungalows/lifetime homes – this creates jobs for local architects, small building firms and artisan crafts people. - Recognise that rural villages outside the KSVs need to grow too to maintain community – but not by moving all the elderly out to retirement complexes in the town.
4	Historic England	We are concerned that no mention of the historic environment is made in the associated text. The conservation and enhancement of the historic environment should be identified as a key outcome, alongside the environmental, social, community and economic benefits with which it is associated. Our 'Heritage Counts' webpages provide detailed information on this: https://historicengland.org.uk/research/heritage-counts/ . Robust consideration should also be given to the quality of the evidence base, with clear conclusions drawn from this to direct specific outcomes (see above).

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12	Theatres Trust	In terms of outcomes, as alluded to above we would suggest that the Plan seeks to protect facilities that are valued and considers the role that cultural uses can play in supporting the role and function of the borough's town centres to help minimise vacancy and ensure town centres are active and well-used at different times of day and night.
21	Seddon Homes	The Government's objective of significantly boosting the supply of housing has been carried forward into the revised National Planning Policy Framework (NPPF), stating at paragraph 59 "to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed". The new Local Plan should, therefore, seek to significantly boost the supply of housing, ensuring sufficient land, in sustainable locations such as land at Ash Flats (see enclosed Location Plan), is able to come forward. The position in the adopted Local Plan is for the housing needs of Stafford Town to be met through the three allocated urban extensions to the north, east and west of the Town. Whilst the extension to the east has progressed and is currently delivering housing, the allocations to the north and west have been slow to come forward and not progressed as quickly as anticipated. This, therefore, provides an opportunity for additional suitable sites, such as Ash Flats, to be considered for accommodating and delivering future housing to meet the needs of the Town and Borough.
23	Eccleshall Parish Council	Health – the return of the 24 hour Accident and Emergency function of the County Hospital, and ensuring all hospital facilities meet the needs of the growing local population. Comprehensive Education facilities at all levels, to encourage the return of more higher education provision within the Borough, and to ensure further education is retained in Stafford, rather than courses being taught more in the partner college in Newcastle Under Lyme. It is vital that consideration is given to a supporting infrastructure of services that will grow along with the increase in housing developments within the Borough. To ensure the preservation of current environmental areas of importance at all costs. To ensure employment/retail areas and support services are easily accessible from residential areas, which may include the provision of good public transport links.
28	Banham, D.	The Borough needs to leverage its North & South transport connections and make significant improvement to its East & West transport connections. (Particularly to the East with the A50 connection to Derby & Nottingham.) The town itself, needs to provide a good mix of leisure facilities for all age groups, combined with the basic amenities of grocery and clothing retail, schools, GP practices, and a hospital that is fit for purpose for the size of the town's population.
35	Highways England	Highways England supports the delivery of new development which is supported by the timely delivery of any necessary highways infrastructure, such as has been determined through a robust transport base and/or site specific technical assessment. It also supports development which optimises opportunities for sustainable transport choices. Through development of this nature, it is expected that economic benefits will be derived through reducing congestion and improving journey reliability. Environmental benefits will be delivered by limiting emissions and improving air quality and health and wellbeing benefits will arise from increased access to leisure and wellbeing opportunities and greater walking and cycling.
37	Knights on behalf of Birch House Lane Industrial Estate	To provide a greater focus on delivering rural housing and economic development that would serve the rural community in accordance with paragraphs 78 of the National Planning Policy Framework (the 'Framework') as well as respond positively to paragraphs 83 and 84 of the Framework).
38	Indigo Planning on behalf of CEG	The revised National Planning Policy Framework (NPPF) carries forward the Government's objective of "significantly boosting the supply of homes" (paragraph 59). For the new Local Plan to be consistent with the NPPF, policies, should also seek to boost significantly the supply of housing. It should ensure that sufficient land is available in suitable and sustainable locations to not only meet housing needs but boost supply. The extension to the Stafford East SUE is a suitable and sustainable site that is available to come forward in the short term to assist the Borough in boosting its housing supply and meeting local housing needs. Further merits of developing this site for housing are set out in the later part of this letter. With regards to the current approach to housing delivery, as set out in the adopted Local Plan, the needs of Stafford Town are to be met through the delivery of three SUEs; one to the north, east and west. Ambitious delivery targets were set for the northern and western SUEs and to date, these two SUEs have not been delivering housing at the rates anticipated. Despite slow progress at the northern and western SUEs, the eastern SUE has already secured consent for 623 dwellings out of a possible 653 and has delivered 237 units. It is anticipated that the whole allocation will be built out by 2022. The new Local Plan, therefore, needs to ensure that it identifies sufficient land around Stafford Town in order for needs to be met and the supply of housing boosted. Furthermore, Stafford Town is identified in the settlement hierarchy as being the "largest urban area in the Borough with a regionally significant service centre role...a key role in driving growth" (New Local Plan Settlement Assessment July 2018). Therefore, as it is the key growth area of the Borough, it is vital that sustainable and deliverable sites, such as the extension to Stafford East, are identified to enable the settlement to meet its objectives of being the key growth area.
39	Savills on behalf of Eccleshall landowners	The delivery of housing will have a positive impact on all of these outcomes. When formulating the new local plan, it should be noted that Stafford Borough Council's Corporate Business Plan 2018 – 2021 aims: "To deliver sustainable economic and housing growth to provide income and jobs". Alongside this, the delivery of housing should also provide positive social, community and health outcomes. This includes developer contributions towards improvements to local services, along with the build-up of a critical mass of residents to enable the provision of new community facilities. The key objectives should include maintaining a balanced portfolio of housing and employment sites in the most sustainable settlements, alongside delivery of appropriate and commensurate infrastructure to support housing and economic growth. A local plan which encourages development in the area will allow for developer contributions to fund improvements to the area that fulfil these outcomes and a critical mass of residents to ensure the viability of local services.

Response Reference	Full name of respondent	Comments
42	Jackson, J.	In the past, businesses located where it was viable and convenient, then employment opportunities attracted residents, so housing was provided, followed by the desired leisure and required health and education facilities. Planning brings order to such development. However, it appears planning is more about building housing in the hope that businesses (including leisure establishments) will be attracted to the area, and that health and education services will cope. Considering the extensive countryside, farming should be encouraged. It is surprising that this sector is not included and support offered.
44	Colwich Parish Council	The Local Plan should deliver quality and sustainability to meet local needs and the local environment, while paying greater head to local concerns.
46	Stephen Locke Associates on behalf of landowners	The key outcomes for economic development should be to support growth, innovation and promote productivity, while identifying and coordinating the provision of appropriate infrastructure. Where possible, major economic developments should be focussed around larger settlements and existing employment sites. The new local plan should help create the conditions in which businesses can invest, expand and adapt. The borough Local Plan also needs to address barriers to investment, such as poor infrastructure, services or housing, or areas of poor environmental standards. It will be important for the borough to identify key strategic sites, such as the land to the south-west of Stone, which can meet local and regional investment objectives. Identifying areas around the Borough where infrastructure is limited and where new infrastructure is required is vital to kick-start further employment and housing growth. This could include road and rail links and appropriate service infrastructure such as power, water and drainage supplies. The Local Plan needs to positively plan for the provision of community facilities such as local shops, schools, doctors' surgeries, places of worship and sporting venues and meeting the needs of an ageing population. In terms of housing, the Borough needs to maintain a sufficient supply of sustainably located housing land to meet the changing demographic needs of the population and the expansion of the borough through economic growth. A positive and proactive approach should be taken to ensure that sufficient choice of school places is available. It is vital that the Council consider from an early stage the social and economic impacts of new development.
48	GVA on behalf of St Philips	Key outcomes that the Local Plan should include the right amount and mix of homes across a variety of locations within the Borough. This will be underpinned through the identification of the Borough's objectively assessed housing need, which will be determined through the Strategic Housing and Economic Land Availability Assessment and the introduction of the Government's standardised methodology for calculating objectively assessed housing need that is embodied within the revised National Planning Policy Framework 2018 (NPPF 2018). The results of the Standard OAN, published as part of the draft Revised National Planning Policy Framework 2018 consultation process, provides a base line for Local Planning Authorities preparing new Local Plans. In the context of Stafford, this equates to 424 dwellings per annum Notwithstanding this position, a review of the Standardised OAN results is expected in November 2018 following the publication of household projections from the Office for National Statistics. The Local Plan will need to implement that outcome of the revised Standard Methodology assessment with regard to the level of housing growth and this should be reflected within the emerging document. In this respect, the emerging plan will need to comply with paragraph 33 of the NPPF which advises that; "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 necessary. 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 emerging Local Plan and policies for the supply of housing and those relevant to settlement boundaries should therefore be prepared flexibly, with suitable wording to ensure that these can be amended to reflect changing housing needs throughout the plan period and with a specific rolling review mechanism at least every 5 years. The emerging Local Plan will also be required to direct housing growth appropriately, in line with the Settlement Hierarchy. Development will therefore be directed to the larger settlements of Stafford and Stone in the first instance, followed by larger market towns and villages, including Eccleshall. Thus, new policies relating to housing should reflect this direction of growth and how it will be supported.
49	Staffordshire County Council	Education The Local Plan should help to ensure that there is sufficient education infrastructure available to meet the needs of the homes that are proposed to be large development sites would be required to provide land for school sites in addition to education contributions to mitigate the development. Ecology The Local Plan should deliver a net gain for biodiversity in line with NPPF 2018 32, 72a, 102d, 118a, 170d, 174b & 175d. The last 2 references indicate that a measurable net gain for biodiversity should be achieved. Landscape The plan should seek to protect and enhance valued landscapes and recognise the intrinsic character and beauty of the countryside in accordance with NPPF 2018 170 and 171. As set out in NPPF paragraph 172 in particular, great weight should be given to conserving and enhancing landscape and scenic beauty in Cannock Chase Area of Outstanding Natural Beauty (AONB).
50	Staffordshire Wildlife Trust (SWT)	In terms of environmental outcomes: <ul style="list-style-type: none"> • 50% of water catchments in the Borough to achieve Good ecological status • 6th of all land to be managed for wildlife (as per England Biodiversity Strategy 2020)

Response Reference	Full name of respondent	Comments
		<ul style="list-style-type: none"> • All land of high nature conservation value to be identified and appropriately designated • All developments to deliver, or contribute to, measurable biodiversity net gain. • Designated wildlife sites to be bigger, better quality, more numerous and better connected than the current baseline. • All residents to have adequate access to natural greenspaces, as recommended by the Natural England Accessible Natural Greenspace Standards.
51	Wardell Armstrong on behalf of Barratt Homes and David Wilson Homes Mercia	<p>The evidence base will need to be brought forward alongside emerging evidence for surrounding local authorities principally Stoke-on-Trent, Newcastle-under-Lyme, Staffordshire Moorlands and Cheshire East authorities through the NPPF requirement to provide for objectively assessed needs for housing and other uses as well as any needs that cannot be met within neighbouring areas (para 11). This should be undertaken through the statements of common ground (NPPF Paragraph 27), documenting the cross-boundary matters being addressed and progress in cooperating to address these.</p> <p>There is recognition that there are ‘overlapping’ market geographies, and housing market connections with these neighbouring authorities which emphasises the need for a strategic approach to any unmet housing need and wider economic growth aspirations with Stone playing its part in the performance of the wider region. To fully meet the legal requirements of the Duty to Co-operate the Council will have to engage on a constructive, active and on-going basis with the neighbouring authorities to maximise the effectiveness of plan making. One key outcome from co-operation should be the meeting of objectively assessed housing needs (OAHN) in full (NPPF para 35).</p> <p>In this context it is to be welcomed that the proposed timeframe of the new Local Plan of 2020 – 2040 would now override the current Local Plan and enable strategic policies to look ahead over a minimum 15-year period from adoption (NPPF para 22).</p> <p>The spatial distribution of housing and the settlement hierarchy should allow identified housing needs to be met in full by providing a framework to ensure advantage is taken of both past and future regenerative successes and challenges such as the economic impact of HS2 and specifically the new opportunities for economic and housing growth arising from the permanent new railhead (IMB-R) and associated supply chain activities in Stone. This would be in line with the aims expressed by the Department for Transport / HS2 and Constellation partnership is to develop a Growth Strategy where high speed rail will stimulate local jobs, growth and regeneration.</p> <p>High Speed 2: Get Ready A report to the Government by the HS2 Growth Taskforce recommended that:</p> <p>Work to include detailed consideration of HS2 in existing Local Plans and Strategic Economic Plans should be well underway by the end of 2014, including relevant aspects of the HS2 Growth Strategy. We believe that all local authorities and Local Enterprise Partnerships (LEPs) touched by HS2 – whether directly or indirectly – should challenge themselves to think about how it will act as a catalyst for development and growth across their city regions.</p> <p>This area within the environs of HS2 and the new railhead, including Stone, forms part of the Constellation Partnership which has already received £1.25m in funding from the Department for Transport to develop a Growth Strategy, “to spearhead economic growth in the region.”</p> <p>The development of such growth strategies to, “explain how high-speed rail will generate local jobs, growth and regeneration,” is a recommendation set out in the HS2 Growth Taskforce’s ‘High Speed 2: Get Ready’ report.</p> <p>With regards to the wider area around Yarnfield, Swynnerton and Stone and the now permanent IMB-R, whilst further consideration needs to be given to the potential impact of the current design of the scheme, consideration must also be given to how to maximise the potential future plans for economic growth. As stated in the NPPF2, planning policies should set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth and seek to address potential barriers to investment, such as inadequate housing, infrastructure, services, or a poor environment. The Railhead at Stone offers an obvious opportunity for such vision and policy development. The attached plan (ST13391-004) illustrates the site context, including the land the subject of Barratt Homes and David Wilson Homes interests, the location of the IMB-R and the other constraints that limit development in the area.</p> <p>Matching delivery of housing alongside economic growth and employment should, therefore, be a vital element of the Local Plan Review and requires a pragmatic approach in policy development and it is imperative that Stafford Borough adopt a more positive, forward looking strategy to growth in Stone than the approach contained within the adopted Plan for Stafford in relation to:</p> <ul style="list-style-type: none"> • The need to deliver beyond the Standard NPPG methodology, which only outlines minimum targets that does not consider economic growth; • Stafford maximising the economic benefits associated with HS2 which will require additional housing over and above minimum targets to provide appropriate market choice etc; and • The Borough fulfilling its contribution to the Government’s ambition for 300,000 new homes a year. <p>The new standardised methodology will require local authorities to take its projected household growth from the latest official projections and make a fixed percentage uplift, depending on the local affordability ratio (the ratio of house prices to earnings) and predicted economic impact assessments. Production of the household projections has now moved to ONS, which will publish its first round of projections – the 2016-based household projections – later this year.</p> <p>It should be recognised that the Standard methodology outlines minimum targets that does not consider economic growth. Indeed, the Government response to the draft revised NPPF consultation highlights that:</p> <p>‘...it is noted that the revised projections are likely to result in the minimum need numbers generated by the method being subject to a significant reduction, once the relevant household projection figures are released in September 2018. In the housing White Paper the Government was clear that reforms set out (which included the introduction of a standard method for assessing housing need) should lead to more homes being built. In order to ensure that the outputs associated with the method are consistent with this, we will consider adjusting the method after the household projections are released in September 2018. We will consult on</p>

Response Reference	Full name of respondent	Comments
		<p>the specific details of any change at that time.’</p> <p>Further adjustment to housing requirements in Stafford over and above the minimum targets are likely to be required in order to maximise the economic benefits associated with HS2 and to provide sufficient and appropriate choice.</p> <p>Stone is identified as a Tier 2 settlement and is a sustainable location for housing to meet future economic activity, offering high potential for growth via sustainable development, contributing to the market attractiveness.</p>
53	Wardell Armstrong on behalf of Dean Lewis Estates	<p>The purpose of the new Local Plan should be to set out a new vision for the development of the Borough, highlighting the key issues to be addressed, setting the objectives to guide new growth and policies to make sure that new development meets local needs in line with national policy set out the National Planning Policy Framework (NPPF).</p> <p>Dean Lewis Estates consider that the by 2040 Stafford Borough will have (amongst other things):</p> <p>Delivered new development, where possible through the re-use of brownfield land and land not of high environmental value, in sustainable locations at Stafford, Stone and the Borough’s selected villages including a major brownfield regeneration opportunity at Cold Meece;</p> <p>By 2040 the Borough’s Villages will have:</p> <p>Delivered a range of new housing at selected villages to provide for the objectively assessed needs of the borough and, where possible, ensured that brownfield regeneration opportunities are maximised;</p> <p>Avoided development in areas that are the subject of national environmental designations.</p> <p>Increased the availability of accessible and enhanced high-quality services and facilities, including public transport provision;</p> <p>Provided new green infrastructure / biodiversity enhancement schemes;</p> <p>Supported a diverse and regenerated rural economy by ensuring the delivery of new homes close to key employment corridors, in particular at Cold Meece;</p>
54	Lefroy, J. MP MP	<ul style="list-style-type: none"> • As close to full employment as possible with an emphasis on quality jobs. • No rough sleeping and a home for all. • Improved building quality. • Good/outstanding schools and colleges for all children and young people. • Good/outstanding health care at primary, secondary and tertiary level. • Significantly improved levels of mental health. • Improved cancer outcomes. • Greatly reduced drug and alcohol abuse. • Greatly reduced obesity • Maintaining (or increasing) our high level of volunteering. • Significantly better air quality, especially in towns. • Zero tolerance of litter and fly-tipping
56	Home Builders Federation (HBF)	<p>The new Stafford Local Plan should be prepared on the basis of joint working on cross boundary issues such as where housing needs cannot be wholly met within individual authorities. To fully meet the legal requirements of the Duty to Co-operate the Council should engage on a constructive, active and on-going basis with the neighbouring authorities to maximise the effectiveness of plan making. One key outcome from co-operation should be the meeting of objectively assessed housing needs (OAHN) in full. The National Planning Practice Guidance (NPPG) states that a key element of examination is ensuring that there is sufficient certainty through formal agreements that an effective strategy will be in place to deal with strategic matters such as unmet housing needs when Local Plans are adopted (ID 9-017). The new Local Plan should be accompanied by a Statement of Common Ground (SoCG) as set out in the revised National Planning Policy Framework (NPPF) (paras 24, 26 & 27).</p> <p>The Local Plan Part 1 adopted in June 2014 and the Local Plan Part 2 adopted in January 2017 make provision for a minimum housing requirement for 10,000 dwellings (500 dwellings per annum) between 2011 – 2031 focussing development on the basis of a sustainable settlement hierarchy of Stafford, Stone and Key Service Villages. The HBF agree that the Council should revisit its previous goals considering both past and future successes and challenges. The spatial distribution of housing and the settlement hierarchy should provide sufficient opportunities to allow identified housing needs to be met in full by providing a clear framework to ensure that policies in the new Local Plan can be effectively applied.</p> <p>The proposed timeframe of the new Local Plan of 2020 – 2040 should provide a period of at least 15 years after the adoption date of the new Local Plan as set out in the revised NPPF (para 22).</p> <p>By the time of the submission of the new Stafford Local Plan for Examination the Government’s standard methodology for the calculation of OAHN will have been implemented. The Government’s proposed methodology is summarised as :-</p> <ul style="list-style-type: none"> • Demographic baseline based on annual average household growth over a 10 year period ; • Workplace-based median house price to median earnings ratio ; • Adjustment factor = (Local affordability ratio – 4)/4 x 0.25 ; • Local Housing Need = (1 + adjustment factor) x projected household growth. <p>Using this standardised methodology the OAHN for Stafford is 423 dwellings per annum (based on 2014 data) which is lower than the adopted Local Plan housing</p>

Response Reference	Full name of respondent	Comments
		requirement. However it should be remembered that the standard methodology is only a minimum starting point. Any ambitions to support economic growth, to deliver affordable housing and to meet unmet housing needs from elsewhere are additional to this figure. The Government's objective of significantly boosting the supply of homes remains. It is important that future housing needs are not under-estimated.
57	Pegasus Group on behalf of Richborough Estates, Gnosall	The new Local Plan should aspire to deliver housing and economic growth levels above the 'minimum' requirement identified through the standard method (as set out in national planning guidance). In doing so, the Local Plan will help to deliver sustainable growth outcomes, including supporting jobs and providing affordable housing. Furthermore, aspiring to deliver a greater level of growth will serve to support the needs of neighbouring authorities, as required by the Duty-to-Cooperate.
58	Pegasus Group on behalf of Richborough Estates, Weston	The new Local Plan should aspire to deliver housing and economic growth levels above the 'minimum' requirement identified through the standard method (as set out in national planning guidance). In doing so, the Local Plan will help to deliver sustainable growth outcomes, including supporting jobs and providing affordable housing. Furthermore, aspiring to deliver a greater level of growth will serve to support the needs of neighbouring authorities, as required by the Duty-to-Cooperate.
59	Pegasus Group on behalf of Richborough Estates, Stone	The new Local Plan should aspire to deliver housing and economic growth levels above the 'minimum' requirement identified through the standard method (as set out in national planning guidance). In doing so, the Local Plan will help to deliver sustainable growth outcomes, including supporting jobs and providing affordable housing. Furthermore, aspiring to deliver a greater level of growth will serve to support the needs of neighbouring authorities, as required by the Duty-to-Cooperate.
60	Pegasus Group on behalf of Lovell Partnerships	The new Local Plan should aspire to deliver housing and economic growth levels above the 'minimum' requirement identified through the standard method (as set out in national planning guidance). In doing so, the Local Plan will help to deliver sustainable growth outcomes, including supporting jobs and providing affordable housing. Furthermore, aspiring to deliver a greater level of growth will serve to support the needs of neighbouring authorities, as required by the Duty-to-Cooperate.
61	Savills on behalf of Lord Stafford Estates	It should be recognised that the delivery of housing will have a positive impact on all of these challenges, including positive social, community and health outcomes. This can be achieved through developer contributions towards improvements to local services, along with the build-up of a critical mass of residents to enable and support the provision of new community and health facilities. A key objective of the Local Plan should therefore be the delivery of housing growth to support the needs of the Borough and to maintain a balanced portfolio of housing sites in the most sustainable settlements. The Local Plan should recognise that developer contributions can fund improvements to that fulfil these outcomes and a critical mass of residents to ensure the viability of local services and delivery of appropriate and commensurate infrastructure to support growth. The Local Plan should also recognise that sustainable housing growth in rural areas can enhance or maintain the viability of local communities. Sustainable development in rural areas is promoted in the revised NPPF (paragraph 78) and the Local Plan should be prepared in this context.
62	Knights on behalf of Jonathan Lloyd Developments Ltd	To provide a greater focus on delivering rural housing and economic development that would serve the rural community in accordance with paragraphs 78 of the National Planning Policy Framework (the 'Framework') as well as respond positively to paragraphs 83 and 84 of the Framework). To deliver controlled growth in a wider variety of locations than the existing Local Plan allows for, including by way of increased levels of housing and employment development in sustainable locations in the rural area - and securing improvements to local infrastructure and community facilities where possible in association with such development. In order to deliver these key outcomes it is considered important for the Local Plan to be aspirational in terms of its aims to deliver the necessary amount of new housing and employment in appropriate locations to serve all aspects of the Borough's population. It should take full advantage of opportunities to deliver new developments on suitable sites in rural locations which can in turn contribute towards supporting the economy of rural areas in accordance with paragraphs 79 and 84 of the Framework which seek to provide good quality homes and places to work in accessible locations for rural communities and support the rural economy, thus enabling the sustainable growth of rural neighbourhoods and enhancing the quality of life for local people.
65	Hinson Parry & Company	We would encourage the use of the plan to support and promote economic growth, and to maximise the opportunities provided by HS2. That can be achieved through taking advantage of the borough's existing economic base and allocating further sites to support additional growth. As national planning policy recognises, a critical part of that equation is delivering enough homes to support economic growth aspirations. While the new standard method establishes a baseline below which housing delivery should not fall, the National Planning Policy Framework ('NPPF') (2018) is clear that housing targets above that de minimis figure will be supported where they are proposed. Delivering enough homes is also a critical factor in delivering social sustainability, and can improve environmental sustainability by reducing commuting distances and enhancing biodiversity.
66	Natural England	The revised NPPF provides a platform for a range of local plan policy measures dealing with the natural environment and the positive interrelationship with human health and the economy. Key changes to the NPPF which we anticipate working with the Council to explore further and deliver, as appropriate, include: <ul style="list-style-type: none"> • strengthened policies on biodiversity net gain and encouraging opportunities to achieve net environmental gains • the treatment of green infrastructure as a strategic policy area • stronger protection for ancient woodland, ancient and veteran trees • the scale and extent of development within National Parks and AONBs should be limited
67	Hopton and Coton Parish Council	The Local Plan should deliver quality and sustainability to meet local needs and the local environment, while paying greater head to local concerns.

Question 3: Policies in the Local Plan can seem very high level but at their heart they are all about creating better places to live, work and play. What would you change in your local neighbourhood to make it a better place to live?

Response Reference	Full name of respondent	Comments
3	Bramall, S.	Slindon Village had the opportunity for one new home and a car park for the church. There was 100% support from all local residents and a Highways health and safety benefit, and no technical objections. The planning officers and parish Council refused this popular local plan as it was “against policy” - ignoring local support for the proposal. How can a project like this – with very strong local support – be incorporated into the plan? How can local opinion be given more weight – what happened to localism?
23	Eccleshall Parish Council	A reduction in HGV thoroughfare More car parking areas An increased provision of bus services, which at present is likely to further decline in 2019 with the removal of a key commuter and school link service. Increased infrastructure provision to support a growing population.
36	Ingestre with Tixall Parish Council	An eastern distributor road or equivalent is urgently needed. Currently HGVs can only cross the Sow/Trent valley at Radford Bank or Wolseley Bridge. There also needs to be a more centralised shopping area in Stafford Town Centre. The new Riverside development has just destroyed the town centre. 3.8 The majority of development will be delivered through the Sustainable Settlement Hierarchy at Stafford, Stone and the Key Service Villages. Other smaller settlements in the Borough are currently not considered appropriate for growth as they have fewer services and facilities. We confirm that there should be no further significant development at Ingestre or Tixall, including along the Tixall Rd and Hanyards Lane.
37	Knights on behalf of Birch House Lane Industrial Estate	By taking full advantage of opportunities to deliver new developments on suitable sites in rural locations which can in turn contribute towards supporting the economy of rural areas in accordance with paragraphs 79 and 84 of the Framework which seek to provide good quality homes and places to work in accessible locations for rural communities and support the rural economy, thus enabling the sustainable growth of rural neighbourhoods and enhancing the quality of life for local people.
39	Savills on behalf of Eccleshall landowners	We understand that the existing Doctor’s surgery facility in Eccleshall is constrained in terms of parking and has limited scope to extend. We consider that a new residential development south of Stone Road could provide a location for a new Doctor’s surgery.
42	Jackson, J.	More consideration should be given to those who have retired and look for a safe and tranquil community in which to live, where those within the same age group and lifestyle can experience mutual support. Such areas do exist now, and imposing unwanted changes would alter the character to the detriment of the current community and force people to leave.
44	Colwich Parish Council	The Council would like greater co-operation / investment in the local infrastructure (e.g. sewerage), with real accountability on local problems such as flooding and relevant bus services. The Council would like to see greater engagement with local people, businesses and agriculture.
46	Stephen Locke Associates on behalf of landowners	It is important that the Borough actively manages patterns of growth in support of the provision of a sustainable transport and infrastructure system. Currently one of the major transport problems is the capacity of the A34 at Stone and especially the connection of the Eccleshall Road to the A34 dual carriageway which is only going to get more substandard as HS2 develops. An opportunity exists to provide a new link-road off the Eccleshall Road to the east of the M6 Motorway which would help to take some traffic to the south-west of Stone and onto the A34, thus reducing the pressure on the existing road network and providing new opportunities for employment, housing and wider community infrastructure.
48	GVA on behalf of St Philips	To ensure the creation of better places to live, work and play, local neighbourhoods are required to provide the right level of homes to support existing and future residents. This is supported through the Government’s Housing White Paper, which was published in February 2017. The Housing White Paper sets out new measures to speed up the supply of new housing and sets out that housing delivery has not kept up with population growth which has resulted in years of undersupply. A need for 300,000 new dwellings per annum by 2020 is subsequently identified. In addition, the Government published the Revised National Planning Policy Framework in July 2018, which sets out at Paragraph 59 that: “To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.” Stafford Borough Council’s new Local Plan seeks to support the Government’s agenda to meet the national housing shortage through the delivery of new dwellings and subsequent employment opportunities across a number of settlements within the administrative area. This will include directing development to Stafford and Stone, the two main settlements within the Borough, followed by Key Service Villages (KSVs) as identified in the existing Local Plan St Philips has reviewed the proposed Settlement Hierarchy 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. In this respect, as the Council will be aware Eccleshall is a town rather than a village and this should be reflected within the emerging Local Plan. The settlements key role is demonstrated within the consultation document Settlement Assessment and Settlement Profile Consultation. In this respect, given the town’s size, population and household, accessibility to employment and accessibility to shops, facilities and amenities, Eccleshall clearly performs a more important role within the Borough than that of a village.

Response Reference	Full name of respondent	Comments
		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, St Philips recommends that another category be added to the hierarchy: ‘Market Towns’. This should aim to accurately reflect the role of the town and subsequent policy wording should ensure that the right level of growth proportionate to the settlements size and scale will be reflected within emerging policies.
49	Staffordshire County Council	The principle of accessible natural greenspace is well-established and all residents should be able to reach an area of natural greenspace. Policy might aim to provide for this and could go some way towards reducing impacts on Cannock Chase Special Area of Conservation. In relation to Paragraph 3.70 (p23) the introduction to this might be better if it read ‘national and international law’ since it goes on to refer to RAMSAR sites. Please note a Typo - Motte Meadows should be listed with the other SACs.
50	Staffordshire Wildlife Trust (SWT)	In terms of issues that SWT is aware of in local neighbourhoods: <ul style="list-style-type: none"> • Sustainable drainage features should be retro-fitted in problem areas, for example where combined sewer systems are being overloaded, or where watercourses are suffering from flooding or pollution. This would also enhance landscaping especially in very urbanised areas. • Greening 'grey' areas as part of regeneration - increasing tree numbers, green areas and natural corridors to make areas better to live and work. • More wildlife-friendly areas in managed open space- e.g. wildflower meadows in parks. The borough has a huge amount of open spaces, most of which are regularly mown and fairly 'featureless'. Different management could enhance these as well as making efficiencies. • Better access for walking and cycling along green routes in urban areas. • Better protection and enhancement of Local Wildlife Sites through the planning system.
53	Wardell Armstrong on behalf of Dean Lewis Estates	Cold Meece sits within an identified strategic employment corridor running from Eccleshall to Swynnerton and incorporating Yarnfield and Cold Meece. The amount of employment floorspace and number of jobs provided here is significantly in excess of the resident working populations of these settlements and the surrounding outlying rural communities. The Local Plan should allocate sufficient land to redress this imbalance between the insufficiency of homes versus the high level of employment provision. The principle of such a policy approach will provide genuine demonstrable benefits in terms of building sustainable communities. Access to local community facilities and services in and around these existing communities is presently good, but additional homes at Cold Meece, making use of a major brownfield regeneration development opportunity will enhance the sustainability of these communities. New development at Cold Meece will deliver essential market and affordable housing together with a commensurate amount of community facilities that will serve to reinforce the vitality and viability of the existing services and facilities within this part of the Borough and help to create a thriving expanded community at the settlement of Cold Meece.
54	Lefroy, J. MP	<ul style="list-style-type: none"> • Even more interaction and mutual support between neighbours; • Greater concern for the public environment. • Cooperative working – for instance local credit unions, volunteering schemes.
62	Knights on behalf of Jonathan Lloyd Developments Ltd	With regard to our client's businesses and land interests in Hixon specifically, we would urge the Council to prepare a new Local Plan that facilitates the provision of a level and nature of growth that would enable the provision of new and varied job opportunities, more places to live and a wider range of community facilities. It is considered that doing so would enhance the sustainability of the village and in turn reduce the need to travel, with resulting benefits for the environment and quality of life of local people. This could be realised by taking the opportunity that has been presented (including by way of our Call for Sites representations in January 2018) to redevelop land at Hixon Airfield to provide a science, technology and commerce park, housing, public open space and local/village centre that could deliver community facilities including some or all of a school, shops, medical and religious facilities. Our client is in the process of collating further information on the development potential/deliverability of their land in Hixon to inform the Council's assessment of it and the strategy for growth of Hixon and development in the wider rural area and Borough as a whole.
66	Natural England	A range of data is available that may help with this question. The Cannock chase SAC partnership work on the repeat visitor survey of the SAC this year may yield valuable information from visitors with a Stafford borough post code. Similarly Natural England's Monitoring Engagement with the Natural Environment (MENE) dataset may offer useful data for consideration. These, together with the Council's existing green infrastructure related information (adopted local plan policy and supporting text/evidence) may form a valuable foundation on which to consider responses to this question from local residents and businesses.
67	Hopton and Coton Parish Council	We have a very poor bus service in Hopton. For example, no local resident can get to the doctor's using public transport.

Question 4: How could the new Local Plan support local villages and their communities to grow and thrive?

Response Reference	Full name of respondent	Comments
3	Bramall, S.	<p>Most villages would cope well and welcome gradual growth – eg one new home every 3-5 years – as this would allow people to upsize/downsize within their community. Villages need starter homes AND bungalows.</p> <p>Not all people who live in a rural area want to move to a town/starter home/retirement village when their children leave home and they wish to downsize. They may have animals or be keen gardeners and wish to stay in their rural community where they have a support network (even if there is no regular bus).</p> <p>However, many of the planning permissions in the 8% for rural areas are simply sat upon by farmers who appear to have no intention of developing the properties. Consequently there is no remaining provision for areas outside the KSVs.</p> <p>The recent call for sites is asking for sites with capacity for 6+ houses – which automatically restricts developments to commercial developers, rather than local people who may have an infill plot they would like to develop for themselves to retire or for their children - and they are likely to spend their money on local architects, builders and craftspeople.</p>
4	Historic England	<p>Facilitating villages and associated communities which ‘grow and thrive’ is a strong aim, and the historic environment could play a very beneficial role in achieving this. For example; by informing new design to create a strong sense of place, by fostering a strong sense of community through the conservation-led regeneration, or the reuse of a historic building for community use. Our webpages on ‘heritage works’ may be of use to you in considering these positive opportunities: https://historicengland.org.uk/images-books/publications/heritage-works/.</p>
12	Theatres Trust	<p>We would suggest the Plan contains a strong policy covering community, cultural and social facilities protecting facilities from unnecessary loss. Such a policy should require robust demonstration that a facility is no longer required by the community and that genuine efforts have been made to maintain the facility including marketing at a price/rent appropriate to existing use without development potential and condition. In terms of local villages and communities, it can be made explicitly clear that such a policy covers facilities such as community halls and public houses as these provide opportunities for the community to come together and also provide opportunities for engagement in cultural activities.</p>
18	Tetlow King Planning	<p>The NHF Home Truth’s report 2017/2018 highlights that too few homes are being built to meet needs, with a shortfall of 40,600 homes across the region - including the substantial shortfall of 19,000 homes attributable to Birmingham. Across the West Midlands there is a need to deliver 10,285 dwellings per annum and around 3,599 affordable housing dwellings (35%) but in 2015/16 only 1,340 affordable dwellings were delivered - just 37% of the annual affordable housing target (CLG Live tables, 2017).</p> <p>The Council has a significant need for new affordable housing over the plan period; the Council should be seeking to maximise its housing target to increase delivery over the plan period. This should be consistent with the PPG and revised NPPF (2018) which requires consideration of the level of affordable housing need, and affordability issues generally (for example lower quartile house price: income ratios), as market signals potentially requiring uplift in the overall target figure.</p> <p>The timing of the Council’s new Local Plan indicates a significant opportunity to be both proactive and imaginative in securing the delivery of affordable housing in villages; drawing upon best practice of the HARP Members and embracing new and emerging delivery mechanisms. The standard practice of securing affordable housing through s106 planning obligations should be pursued and set at an appropriate level in accordance with a viability appraisal.</p> <p>Registered Providers working in partnership with LPAs can be the catalyst to significantly increasing the supply of affordable homes. We would recommend looking to involve Housing Associations as far as possible in setting a local definition of affordable housing that will encourage delivery of all affordable housing types. As the presumption should always be in favour of on-site affordable housing delivery, the preference for early engagement with local Housing Associations should be emphasised in the Plan policies.</p>
23	Eccleshall Parish Council	<p>Eccleshall Neighbourhood Plan initially suggested Croxton as a potential location for additional housing, however with the loss of the bus service it is now considered a less suitable location. Slindon, although also without a bus service, is on the A519 and would be considered for suitable small scale development.</p> <p>Infrastructure needs to be considered pro-actively, ahead of any planning development especially at these locations.</p> <p>Specifically, expansion of local health service provision to support a growing, and ageing, population.</p>
28	Banham, D.	<p>Better transport links, which is predicated on having better (wider) roads.</p>
36	Ingestre with Tixall Parish Council	<p>Ingestre and Tixall do not wish to grow, but need small homes for young people and downsizing pensioners.</p>
37	Knights on behalf of Birch House Lane Industrial Estate	<p>By promoting the redevelopment of a range of sites within rural areas, which can be accessed by the rural community, to deliver residential and economic development commensurate with the respective villages and the surrounding rural communities in accordance with paragraphs 78, 79 and 84 of the Framework.</p>
39	Savills on behalf of Eccleshall landowners	<p>The new Local Plan can support the growth of villages by providing new housing and employment opportunities. There should be an emphasis on growth in village locations, as development if planned correctly can improve the sustainability of villages. This approach can also provide the necessary contributions to fund new and improved community facilities and public services.</p> <p>Such development should be targeted towards Key Service Villages, such as Eccleshall as updated by the new settlement assessment. If development is targeted towards the most sustainable locations, it can also improve the viability of such locations to support community and public services. We consider that appropriate housing growth in the right places will enable the Council to provide a balanced portfolio of housing and employment sites.</p>
42	Jackson, J.	<p>Support should be given to maintain current bus services and promote mobile services (e.g. libraries) and outreach services (e.g. GP clinics, post offices).</p>

Response Reference	Full name of respondent	Comments
44	Colwich Parish Council	The Local Plan should support villages better by providing a better alignment of infrastructure and local transport, where there is new development. It should provide greater encouragement for starter homes and for homes for the elderly. The Local Plan should insist that developers and the planning department are held accountable for planning conditions. There should be automatic site visits by all relevant agencies for all new development.
46	Stephen Locke Associates on behalf of landowners	Some additional sustainable development in rural areas including villages should be supported to enable the maintenance and enhancement of existing rural communities. Services such as rural schools are under pressure to survive and some new development in these areas would help villages to grow and thrive rather than becoming commuter dormitories. Services in these locations need to be maintained, developed and modernised in a way that is sustainable and retained for the benefit of the community. The key to enabling villages to grow and survive is to ensure that some additional growth is supported. It is important to ensure that all communities have a variety of housing stock which reflects a variety of needs. By providing more homes in smaller settlements, services and facilities such as schools, shops and other community facilities can be supported and sustained.
48	GVA on behalf of St Philips	Our client agrees, in principle, with the proposed strategy to promote development through the Sustainable Settlement Hierarchy, currently adopted within the existing Local Plan. Under the existing hierarchy development will be directed to Stafford in the first instance, followed by Stone, before the 17 Key Service Villages. The revised hierarchy directs growth as follows: <ul style="list-style-type: none"> • Stafford; • Stone; • North Staffordshire Urban Area; • Large Villages (500+ dwellings), including Eccleshall; • Medium Villages (250 + dwellings); and • Small Villages (50+ dwellings). However, as set out in the response to question 3 St Philips wish to object to the status of Eccleshall within the Settlement Hierarchy. In this respect, as the Council will be aware Eccleshall is a town rather than a village and this should be reflected within the emerging Local Plan. The settlements key role is demonstrated within the consultation document Settlement Assessment and Settlement Profile Consultation. Thus, given the town's size, population and household, accessibility to employment and accessibility to shops, facilities and amenities, Eccleshall clearly performs a more important role within the Borough than that of a village. 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, St Philips recommends that another category be added to the hierarchy: 'Market Towns'. This should aim to accurately reflect the role of the town and subsequent policy wording should ensure that the right level of growth proportionate to the settlements size and scale will be reflected within emerging policies. St Philips therefore recommend that the revised settlement hierarchy directs growth as follows: <ul style="list-style-type: none"> • Stafford; • Stone; • North Staffordshire Urban Area; • Market Towns including Eccleshall; • Large Villages (500+ dwellings); • Medium Villages (250 + dwellings); and • Small Villages (50+ dwellings). In terms of delivering land for new housing the land at Castle Street is located on Greenfield land adjacent to the settlement boundary of Eccleshall and comprises the land east of Castle Street, as demonstrated in the site plan included in the Vision Document submitted as part of these representations. The site is well bound by a tributary to the River Sow in the north, existing development and agricultural land to the east, the existing settlement boundary to the south, and Castle Street to the west. The result of these defensible boundaries will reduce future development future development pressures and the further expansion of the town in this location. The site represents a sustainable location for development in relation to the rest the village inasmuch that amenities, facilities and opportunities to utilise public transport can be realised from the site access point. Furthermore, the site provides an opportunity to meet one of the aspirations of the Parish Neighbourhood Development Plan, as set out on Page 12 and 13 of the document. In this respect the masterplan proposes to deliver a Country Park and riverside walk along the banks of a tributary to the River Sow. Thus, enhancing the provision of open space within the existing community. It is considered that the extension of the Settlement Boundary in this location provides an opportunity to deliver up to 20 residential dwelling, to support the growth of the Borough in a self-contained land parcel. As detailed, the site provides clear defensible boundaries which would serve to restrict the future growth of the settlement in this area.

Response Reference	Full name of respondent	Comments
49	Staffordshire County Council	<p>Education</p> <p>Generally the key service villages which were earmarked within the adopted local plan included primary schools that could either accommodate the proposed housing growth or were capable of expansion to mitigate the housing growth already proposed. Depending upon the location and proposed dwelling numbers of future sites for a Local Plan which extends to 2040, further expansions may not be possible at certain locations. Should further development be proposed in these areas as part of a revised settlement hierarchy then land will be required for new school sites or to enable expansion of existing schools. This could also be a factor in establishing an appropriate scale and mix of housing.</p> <p>It is noted that the Call for Sites exercise to inform the New Local Plan resulted in 160 submissions, once there is further detail on the 160 sites with the publication of a Strategic Housing & Employment Land Availability Assessment (SHELAA) report, a more detailed consideration of impact on education infrastructure can be undertaken.</p> <p>Also noted is the different settlement hierarchy proposed within the Settlement Assessment for the proposed Local Plan period which comprises of seven settlement levels. It is further noted that a new garden settlement is in the concept stage. The requirement for education infrastructure in these settlement categories is considered below under question 18.</p>
50	Staffordshire Wildlife Trust (SWT)	<p>Support for sustainable rural businesses</p> <p>Support the creation of neighbourhood plans</p> <p>Audit the natural resources of settlements in terms of open spaces and ecological networks, so that these can be enhanced, and help maintain the character of individual villages.</p>
51	Wardell Armstrong on behalf of Barratt Homes and David Wilson Homes Mercia	<p>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 (NPPF para 68) as opposed to the lead-in times for large scale sites which can affect likely rates of delivery (para 72). Stafford Borough Council need to take this into consideration when considering its position of relying on proposals to build a garden village, predominantly on Ministry of Defence land at Cold Meece, in response to the development of a railhead for HS2 in Stone. The Independent Review of Build out rates Draft Analysis - June 2018 (The Letwin Review) concluded that there is evidence that smaller sites will tend to build out a greater proportion of the site each year than larger sites.</p> <p>It is clear that over reliance on such larger sites would not be appropriate in delivery of the homes needed and that a range of sustainable sites will be necessary to accommodate the OAN.</p> <p>It will be prudent to set out the anticipated rate of development for specific sites and that this will need to take account of the direction within the NPPF that sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.</p> <p>Setting a clear policy vision and strategy will be critical in supporting the making of Neighbourhood Plans, especially where there is an economic imperative that needs to be established.</p>
52	GVA on behalf of Taylor Wimpey	<p>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.</p> <p>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.</p> <p>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).</p>
53	Wardell Armstrong on behalf of Dean Lewis Estates	<p>The new Local Plan should identify development that focuses on sustainable place making, exploiting regeneration opportunities involving the utilisation of brownfield land (NPPF Para 117). Such development opportunities that sit outside of the existing Local Plan settlement hierarchy should be fully appraised in terms of their suitability benefits and impacts rather than simply tested in locational terms against an out-dated settlement hierarchy approach.</p> <p>The Sustainability Assessment against which the new Local Plan will be tested should enshrine the necessary tests to assess the sustainability credentials of new development that is outside the historic settlement hierarchy.</p> <p>In practice, this means that the major brownfield regeneration opportunity at Cold Meece should be properly assessed in terms of its contribution toward housing delivery, sustaining and growing employment, enhancing public transport, supporting and delivering community services and facilities and delivering significant environmental benefits.</p>
54	Lefroy, J. MP	<ul style="list-style-type: none"> • More say for local villages over development – provided that a certain sustainable amount of development is accepted. • More input from local villages into the design and quality of housing built. • Requiring greater contributions directly to villages by developers to be invested in local infrastructure, schools and health facilities. • Ensuring that the local plan recognises the need to provide opportunity for businesses to be established and grow locally.

Response Reference	Full name of respondent	Comments
56	Home Builders Federation (HBF)	It is important that the Council's proposed housing distribution re-considers the permitting of development adjacent to as well as within settlement boundaries which addresses the recognised difficulties facing rural communities in particular housing supply and affordability issues. The proposed distribution of housing should meet the housing needs of both urban and rural communities. The relationship between the new Local Plan and Neighbourhood Plans should be clearly set out in accordance with the revised NPPF (paras 13, 29 & 30 and Footnote 16).
57	Pegasus Group on behalf of Richborough Estates, Gnosall	The adopted Local Plan for Stafford Borough seeks to deliver the majority of development at Stafford, Stone and the Key Service Villages. Other smaller settlements in the Borough are not identified as delivering part of the housing requirement for the Borough. The new Local Plan for the Borough could support villages by attributing proportionate levels of housing growth to the settlements identified as being most sustainable, outside of the Key Service Villages. By planning positively for proportionate growth, the Council will allow local villages and communities to thrive economically, socially and environmentally, whilst avoiding less desirable, un-planned growth.
58	Pegasus Group on behalf of Richborough Estates, Weston	The adopted Local Plan for Stafford Borough seeks to deliver the majority of development at Stafford, Stone and the Key Service Villages. Other smaller settlements in the Borough are not identified as delivering part of the housing requirement for the Borough. The new Local Plan for the Borough could support villages by attributing proportionate levels of housing growth to the settlements identified as being most sustainable, outside of the Key Service Villages. By planning positively for proportionate growth, the Council will allow local villages and communities to thrive economically, socially and environmentally, whilst avoiding less desirable, un-planned growth.
59	Pegasus Group on behalf of Richborough Estates, Stone	The adopted Local Plan for Stafford Borough seeks to deliver the majority of development at Stafford, Stone and the Key Service Villages. Other smaller settlements in the Borough are not identified as delivering part of the housing requirement for the Borough. The new Local Plan for the Borough could support villages by attributing proportionate levels of housing growth to the settlements identified as being most sustainable, outside of the Key Service Villages. By planning positively for proportionate growth, the Council will allow local villages and communities to thrive economically, socially and environmentally, whilst avoiding less desirable, un-planned growth.
61	Savills on behalf of Lord Stafford Estates	It is considered appropriate for most development to be delivered through the Sustainable Settlement Hierarchy at Stafford, Stone and the Key Service Villages, such as Yarnfield. However, paragraph 3.8 of the Scoping Report states that other smaller settlements which are not categorised as Key Service Villages, are currently not considered appropriate for growth as they have fewer services and facilities. The Local Plan should not dismiss smaller settlements in principle as being inappropriate for growth. This represents conflict with paragraph 78 of the revised NPPF, which promotes the sustainable development of housing in rural areas where it will enhance or maintain the vitality of rural communities. Paragraph 78 also states that opportunities should be identified for villages to grow and thrive, especially where this will support local services. The Local Plan should recognise that smaller settlements often provide opportunities for sustainable growth and comprise existing facilities that would support growth. The Settlement Assessment identifies medium and small villages that comprise a number of existing services and facilities that can support growth, such as Swynnerton. Development can also improve the sustainability of villages and can provide the necessary contributions to fund new and improved community facilities and public services.
62	Knights on behalf of Jonathan Lloyd Developments Ltd	By promoting the redevelopment of a range of sites within rural areas, which can be accessed by the rural community, to deliver residential and economic development commensurate with the respective villages and the surrounding rural communities in accordance with paragraphs 78, 79 and 84 of the Framework. It could also support the growth, vitality and sustainability of local villages by taking any suitable, available opportunities to enable the delivery of housing and/or economic development that could also deliver infrastructure improvements and additional community facilities (both of which apply to our client's land at Hixon Airfield as outlined in our Call for Sites representations in January 2018).
66	Natural England	We note that the revised NPPF's changes to local plan making encourage Neighbourhood Development Plans to include allocation of land for new house building. Natural England would welcome further dialogue with the Council to understand how this might work in practice.
67	Hopton and Coton Parish Council	There is a request that planning officers do site visits as soon as a planning application comes in. Villages do not want to grow – we want the villages to stay the same but with improvements. There should be an insistence that the Planning Department is expanded to cope with the current level of demand.

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?

Response Reference	Full name of respondent	Comments
3	Bramall, S.	This does not seem practical.
4	Historic England	We encourage you to carefully consider the historic environment at an early stage with respect to considerations for sites and densities. This includes having 'special regard' and giving 'great weight' to the conservation of designated heritage assets and any contribution made by their setting in line with your statutory duties under the Planning (Listed Buildings and Conservation Areas) Act 1990 and the National Planning Policy Framework. At this early stage, we refer you to our guidance on the subject above, most notably that on site allocations.
18	Tetlow King Planning	We do not support any potential introduction of a range of densities for the Borough as minimum densities can cause problems in terms of viability for Registered Providers. Instead the Council should make a commitment to support development that makes efficient use of land in accordance with paragraph 123 of the

Response Reference	Full name of respondent	Comments
		revised National Planning Policy Framework (July 2018) (NPPF). If minimum densities are set to be applied within the area then any optional space standard should be applied across all tenures and not just affordable. Applying standards to only affordable housing development can cause problems in terms of viability and as market schemes can be developed at higher densities where the standard is applied to affordable housing only, this has left Registered Providers in the position of being unable to compete on an equal basis with other developers for land.
21	Seddon Homes	There is a desire through the revised NPPF for plans / policies / decisions to make efficient use of land; with one method of achieving this to be through the use of minimum density standards (NPPF paragraph 123). However, the NPPF also notes that it might be more appropriate, in some instances, to set out a range of densities to reflect the differences and specific circumstances of different areas. There would be objection to any policy proposing strict density targets to be met. A flexible range of densities, with the ability to deviate from these where specific circumstances dictate, is more aligned to the provisions of the NPPF.
23	Eccleshall Parish Council	Current density levels should be retained as to be sustainable.
28	Banham, D.	Yes; housing estates with high densities just create over crowding problems and exacerbate social decay in the long run. It also creates problems for the increasing level of car ownership since there is insufficient space for a household to keep all of its vehicles off the road.
35	Highways England	Higher densities could be supported where there is access to sustainable transport choices, including public transport nodes such as rail stations and bus stops. Where such nodes are not available, consideration should be given to whether S106 or CIL monies could be used to help fund enhanced services, to support higher density living.
38	Indigo Planning on behalf of CEG	The revised NPPF does seek to ensure that developments do make optimal use of the potential of each site. One of the suggested means of achieving this is through setting minimum density standards for city and town centres and other locations that are well served by public transport (NPPF paragraph 123). However, there could be site specific circumstances that impact upon the density developments are able to achieve. Therefore, any policies which do seek to encourage specific densities to be achieved should be sufficiently flexible to enable each site and scheme to be considered on its individual merits in terms of the densities it is able to deliver. There would be objection to any policies imposing strict density targets to be met. Ensuring flexibility would be reflective of the provisions of the NPPF, which does note that in some instances "it may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than on broad density range" (paragraph 123).
39	Savills on behalf of Eccleshall landowners	No. Each location (site and settlement) should be considered on its own merits, and subject to existing constraints, opportunities, character and proximity to public transport. All of these factors will provide varied influences on the density of development that is appropriate in each location.
42	Jackson, J.	There should be fixed densities in rural areas, especially for rural exception sites, to prevent housing estates and closely clustered homes being built. The number of dwellings should definitely not exceed a total of 10 for the whole settlement; otherwise, rural areas will take on an urban character.
44	Colwich Parish Council	Yes, there should be differing densities depending on the location, local character and needs of local residents.
46	Stephen Locke Associates on behalf of landowners	The supply of large numbers of new homes can often be best achieved through planning for larger scale development such as extensions to existing towns and villages. Here, a variety of densities can be accommodated. It is inappropriate to suggest a specific density for an area and it is more important to ensure that a variety of homes and employment sites are provided to meet the needs of different sectors of the community. As part of this submission we would like to promote the strategic location of the land south west of Stone which also fronts the A34 to the south of Stone Business Park and borders the B5026 Eccleshall Road. This site provides a major opportunity to sustainably expand the town and meet the long terms needs of both the local community and the wider aspirations of the Borough. The sites relationship with Stone and the potential to extend the existing business park will reduce the need to travel and provide opportunities for local people to work closer to home. The site is also within 2 km of the centre of Stone which is a key sustainability consideration.
48	GVA on behalf of St Philips	Where appropriate, density guidance should be provided within the emerging policies of the new Local Plan. In this context, specific regard should be had to Stafford, Stone, and the North Staffordshire Urban Areas (as per the proposed Settlement Hierarchy) as development densities in these locations are anticipated to be much higher than those in rural areas. It is therefore suggested that a minimum density of 30 dwellings per hectare should be applied to these areas. For all other settlements and proposed locations for development within the Borough, including Large Villages, Medium Villages and Small Villages (as per the proposed Settlement Hierarchy), it is considered that the density of development should be informed by the existing character and layout of the surrounding areas, housing needs, and accessibility to local services. Such locations should therefore be considered on a case by case basis. In the context of the proposed development site, it is acknowledged that the density will be relatively low, at 8 dwellings per hectare. However, this affords the opportunity to provide a Country Park in line with the aspirations of the Eccleshall Parish Neighbourhood Development Plan, whilst maintaining a rural, soft edge to the settlement boundary and existing landscaping views from surrounding footpaths and the scheduled ancient monument comprising the castle.
50	Staffordshire Wildlife Trust (SWT)	It may be useful to specify densities, for clarity. However, the most dense land uses should still have a minimum amount of green space and green networks within them, so this standard should be set also. Densities should seek to protect and enhance ket ecological sites. 3.11, 3.12 Prioritising Brownfield Land The document fails to mention brownfield land of high environmental value, which needs to be considered. Appropriate data on these sites needs to be included in the brownfield register. the Planning Practice Guidance states in Paragraph: 024 Reference ID: 8-024-20140306:

Response Reference	Full name of respondent	Comments
		'A core principle in the National Planning Policy Framework is to encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value. This means that planning needs to take account of issues such as the biodiversity value which may be present on a brownfield site before decisions are taken. Defra has published information on Open Mosaic Habitats, a specific type of habitat that is of high ecological value and which occurs on brownfield land. Where insufficient information is available, survey work may be appropriate to assess ecological value before decisions on development are taken.'
51	Wardell Armstrong on behalf of Barratt Homes and David Wilson Homes Mercia	Para 122 of the NPPF now states that planning policies and decisions should support development that makes efficient use of land, but that this must take account of a range of factors, including the need for different types of housing; local market conditions and viability; available infrastructure and services and the prevailing character and setting. Where there is an existing or anticipated shortage of land for meeting identified housing needs (para 123), 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 (123b). Therefore, a blanket approach to a minimum density across the Borough would be inappropriate and unlikely to meet the housing needs of different groups. While the Borough might set a direction as to whether it might generally prefer higher densities in order to meet its housing needs, or lower ones to be in keeping with existing housing, the inter-relationship between density, house size (any implications from the introduction of optional space and accessible / adaptable homes standards), house mix, viability and overall character and setting should be left for careful consideration at the planning stage of the development.
52	GVA on behalf of Taylor Wimpey	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. 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.
53	Wardell Armstrong on behalf of Dean Lewis Estates	The Local Plan should provide flexibility in its policy with regard to densities. The development at Cold Meece will be guided by a Development Framework Plan that will demonstrate how the proposals respond the site context in terms of constraints and opportunities. The density of development will provides an appropriate response to these factors and will seek to maximise the reuse of brownfield land within the development. The Local Policy should require the provision of a Development Framework Plan to be agreed with the LPA rather than prescribe densities for each housing allocation.
56	Home Builders Federation (HBF)	The adopted Local Plan Policy states that development proposals should take account of local character, context and density which remain appropriate and relevant criteria. The HBF is supportive of the efficient use of land. The setting of any density standards in the new Local Plan should only be undertaken in accordance with the revised NPPF (para 123) in the circumstances of an existing or anticipated shortage of land for meeting identified housing needs. In such circumstances a minimum density in suitable locations such as town centres and those benefiting from good public transport connections may be appropriate. However a blanket approach to a minimum density across all the Borough would be inappropriate and unlikely to provide a variety of typologies to meet the housing needs of different groups. The inter-relationship between density, house size (any implications from the introduction of optional space and accessible / adaptable homes standards), house mix and developable acreage on viability should also be carefully considered especially if future development is located in less financially viable areas.
57	Pegasus Group on behalf of Richborough Estates, Gnosall	Richborough Estates supports the efficient use of land, in accordance with National Planning Policy and Guidance. The setting of any density standards in the new Local Plan should only be undertaken in accordance with Paragraph 123 of the NPPF, which stipulates that such standards should be utilised 'where there is an existing or anticipated shortage of land'. Standards should be applied in suitable locations such as town centres and those benefiting from good public transport links. Paragraph 123 of the NPPF also indicates that 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 across an entire local authority area. Richborough Estates would endorse this approach. Any standard should also retain a degree of flexibility to allow for development to reflect local character. Regarding the application of such standards, Richborough Estates considers that any standard should be set within a Local Plan Policy rather than in a Supplementary Planning Document (SPD). The inclusion of standards within the Local Plan not only provides certainty to developers upfront but would also be subject to viability testing and examination in public, thus ensuring that the standards are deliverable.
58	Pegasus Group on behalf of Richborough Estates, Weston	Richborough Estates supports the efficient use of land, in accordance with National Planning Policy and Guidance. The setting of any density standards in the new Local Plan should only be undertaken in accordance with Paragraph 123 of the NPPF, which stipulates that such standards should be utilised 'where there is an existing or anticipated shortage of land'. Standards should be applied in suitable locations such as town centres and those benefiting from good public transport links. Paragraph 123 of the NPPF also indicates that 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 across an entire local authority area. Richborough Estates would endorse this approach. Any standard should also retain a degree of flexibility to allow for development to reflect local character. Regarding the application of such standards, Richborough Estates considers that any standard should be set within a Local Plan Policy rather than in a

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		Supplementary Planning Document (SPD). The inclusion of standards within the Local Plan not only provides certainty to developers upfront but would also be subject to viability testing and examination in public, thus ensuring that the standards are deliverable.
59	Pegasus Group on behalf of Richborough Estates, Stone	Richborough Estates supports the efficient use of land, in accordance with National Planning Policy and Guidance. The setting of any density standards in the new Local Plan should only be undertaken in accordance with Paragraph 123 of the NPPF, which stipulates that such standards should be utilised 'where there is an existing or anticipated shortage of land'. Standards should be applied in suitable locations such as town centres and those benefiting from good public transport links. Paragraph 123 of the NPPF also indicates that 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 across an entire local authority area. Richborough Estates would endorse this approach. Any standard should also retain a degree of flexibility to allow for development to reflect local character. Regarding the application of such standards, Richborough Estates considers that any standard should be set within a Local Plan Policy rather than in a Supplementary Planning Document (SPD). The inclusion of standards within the Local Plan not only provides certainty to developers upfront but would also be subject to viability testing and examination in public, thus ensuring that the standards are deliverable.
60	Pegasus Group on behalf of Lovell Partnerships	Lovell Partnerships supports the efficient use of land, in accordance with National Planning Policy and Guidance. The setting of any density standards in the new Local Plan should only be undertaken in accordance with Paragraph 123 of the NPPF, which stipulates that such standards should be utilised 'where there is an existing or anticipated shortage of land'. Standards should be applied in suitable locations such as town centres and those benefiting from good public transport links. Paragraph 123 of the NPPF also indicates that 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 across an entire local authority area. Lovell Partnerships would endorse this approach. Any standard should also retain a degree of flexibility to allow for development to reflect local character. Regarding the application of such standards, Lovell Partnerships considers that any standard should be set within a Local Plan Policy rather than in a Supplementary Planning Document (SPD). The inclusion of standards within the Local Plan not only provides certainty to developers upfront but would also be subject to viability testing and examination in public, thus ensuring that the standards are deliverable.
61	Savills on behalf of Lord Stafford Estates	Each location (site and settlement) should be considered on its own merits, and subject to existing constraints, opportunities, character and proximity to public transport. All of these factors will provide varied influences on the density of development that is appropriate in each location.
62	Knights on behalf of Jonathan Lloyd Developments Ltd	It is considered that the new Local Plan should set a target minimum density for town centre locations and at each level of the settlement hierarchy, but in doing so also acknowledge that each individual development will need to be treated on its own merits at planning application stage.
65	Hinson Parry & Company	Density targets can be helpful as a guide and to encourage the efficient use of land. However care should be taken in how they are worded. For example, to encourage high quality design that is sensitive to the characteristics of the surrounding area, flexibility to vary from the targets would need to be provided.
66	Natural England	A strategic approach to green and blue infrastructure offers a valuable opportunity to ensure that decisions over development density work effectively in delivering multi functional green infrastructure. For example established research and practice in relation to green infrastructure (ref Biodiversity by Design) suggest that higher density development can be designed to incorporate high quality green and blue infrastructure resources.
67	Hopton and Coton Parish Council	Stafford Borough Council looks at figures rather than people and areas and this means that builders and developers are completely out of touch with local residents.

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?

Response Reference	Full name of respondent	Comments
3	Bramall, S.	There are plenty of infill sites which are outside KSVs and not in greenbelt. Most villages could accommodate one or two new houses every few years – and individual / self-build projects have good economic benefits locally – unlike mass building developments. There is no need to jeopardise any greenbelt land in Staffordshire.
21	Seddon Homes	The revised NPPF does place a large emphasis on encouraging the re-use of brownfield land in a bid to meet an areas housing needs. However, there is no sequential assessment set out that requires all brownfield land to be considered in the first instance before any greenfield sites can come forward. Therefore, for the new Local Plan to include any such sequential test would be contrary to the provisions of the NPPF, and not be supported. The thrust of the revised NPPF is the delivery of sustainable development, noting at paragraph 10 “so that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development”. The measure is, therefore, whether a site/scheme is sustainable not whether or not it is on a brownfield or greenfield site. Land south of Ash Flats is a greenfield site but does form a logical extension to Stafford Town and provides an excellent opportunity to widen housing choice in the Town and across the Borough. The Scoping the Issues Report (paragraph 2.3) notes that due to the accessibility and level of services within Stafford Town, it

Response Reference	Full name of respondent	Comments
		<p>could be a key focus for major new development. Whilst the site is located outside of the current settlement boundaries, it was referred to as a sustainable location for housing in the Inspectors Report for the Local Plan Part Two. It was only discounted on the basis that the site was not needed at that time. However, given the Local Plan is now being reviewed, this provides an opportunity for sustainable sites, such as Ash Flats, to be re-considered.</p> <p>The site is well contained due to existing development to the north (residential) and east (commercial) and the presence of the M6, Stafford to Birmingham railway and the A449 main road. The fact the site is well contained with strong physical boundaries, means that its development would not encroach into the open countryside.</p> <p>There are a number of bus stops located within close proximity of the site which offer regular journeys into Stafford Town Centre, providing easy access to a significant range of services and facilities. In addition, paragraph 2.3 of the Scoping the Issues Report, sets out that the Town of Stafford is located on a national road and rail network with the highest level of services and facilities.</p> <p>There are no technical constraints which would prevent development from being delivered and a suitable and safe access off Moss Pit Lane can be achieved. Overall, the site is suitable to accommodate residential development, with no constraints to hinder deliverability.</p> <p>Paragraph 72 of the revised NPPF does indicate that urban extensions can often provide a solution to delivery of a large supply of new homes, stating (emphasis added):</p> <p>“the supply of large numbers of new homes can often be best achieved through planning for large 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.”</p> <p>Therefore, there is an acceptance at the national level that sites, such as land at Ash Flats, can offer a solution to providing additional housing land required to meet the needs of the Borough. Sites such as this should not automatically be discounted as the Local Plan progresses.</p>
23	Eccleshall Parish Council	<p>The Borough Council does not appear to prioritise brownfield sites.</p> <p>In order to encourage developers to take on brownfield sites which are more expensive to build on, it may need to consider allocation of grants to support the additional costs.</p>
36	Ingestre with Tixall Parish Council	<p>3.14 Housing should be of a high quality, sufficient quantity, affordable and of the type needed in order to create successful communities. It is important to plan for a mix of homes, and a range of sizes and types to meet both current and future housing needs.</p> <p>We support this. Currently developers build too many "Executive Homes" at the expense of smaller homes and bungalows for older people and young families.</p>
37	Knights on behalf of Birch House Lane Industrial Estate	<p>If the Council cannot find sufficient PDL sites to meet the need for housing and employment requirements then, in accordance with paragraph 117 of the Framework, it should firstly consider sites that contain a mix of brownfield and greenfield land before considering sites that are entirely greenfield. To this effect my client has an available site at Birch House Lane Industrial Estate, Cold Meece (which has already been promoted in the previous Call for Sites exercise) that could bring forward a comprehensive residential development, a more extensive employment site (including starter units and more modern facilities) or a mixed use development.</p>
38	Indigo Planning on behalf of CEG	<p>Utilising brownfield land to assist in meeting an areas housing need is strongly encouraged throughout the revised NPPF. However, it does not go as far as setting out a sequential assessment which requires all brownfield sites to be considered for redevelopment in the first instance and only when all these can be discounted should greenfield sites be considered. Therefore, the introduction of a mandatory sequential “brownfield first” assessment in the new Local Plan would not be supported as it would be contrary to the provisions of the NPPF and would also hinder the delivery of sustainable greenfield sites which can contribute towards meeting housing need.</p> <p>It is important to note that the presumption in favour set out in the NPPF relates to sustainable development, regardless of whether the site is brownfield or greenfield; “at the heart of the Framework is a presumption in favour of sustainable development” (NPPF paragraph 10). Sites/schemes should, therefore, be assessed as to whether or not the proposal would represent sustainable development, not whether it is on a brownfield or greenfield site.</p> <p>Land to the east of the existing Stafford East SUE is a greenfield site, but offers a sustainable development opportunity involving the extension of the existing settlement limits on the eastern edge of Stafford Town. This would provide additional housing land and support the creation of a new community hub along with new education facilities.</p> <p>It is a circa 73ha site and seeks to build on the extensive infrastructure provisions, including a mix of uses and public transport accessibility already available in this area of the town, whilst also facilitating a further improved service offering.</p> <p>In light of the ongoing delays to the delivery of the existing planned SUEs at Stafford North and Stafford West and the need for the Council to plan for further housing delivery in and around the town, the expansion of Stafford East is the next logical deliverable extension for the town. A detailed report was submitted towards the Council’s Call for Sites consultation in January 2018 and July 2018; this submission demonstrated the site’s suitability for the delivery of new housing alongside a mix of other uses.</p> <p>The site is deliverable, meeting the criteria set out in the NPPF definition. It is being promoted by CEG and is available for development immediately, with no landownership issues to prevent it being brought forward.</p> <p>Whilst it is located outside the current settlement boundary of Stafford Town, it is well connected to the built-up area in terms of its relationship to the Stafford East SUE. There are no environmental factors that would render the site as unsuitable for residential development. On this basis, the site is suitable and delivery of housing at the site is achievable. Having considered the sites potential for development, the landowner is also confident that the proposal is economically viable in</p>

Response Reference	Full name of respondent	Comments
		<p>the current economic climate.</p> <p>The NPPF does also acknowledge the importance of large greenfield sites, such as the Stafford East extension, being developed in order to meet housing need. It states at paragraph 72 (emphasis added):</p> <p>“the supply of large numbers of new homes can often be best achieved through planning for large 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...strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way”.</p> <p>This demonstrates that there is an acceptance, at the national level that sites, such as the Stafford East extension, can offer a sustainable solution to providing additional housing land in order to meet the needs of the Borough. Therefore, as the new Local Plan is being prepared, the extension to Stafford East should be considered and taken forward as a potential housing allocation. This aligns with the findings of the Local Plan Part Two Inspector, which acknowledged that extending the Stafford East SUE would deliver a further 1,250 dwellings in a relatively un-constrained and sustainable location; the Inspector considered that this is a matter to be considered at the plan review stage; which is now.</p>
39	Savills on behalf of Eccleshall landowners	<p>The Council should focus on providing new development opportunities in the most sustainable settlements with an appropriate range of services, facilities and access to employment opportunities.</p> <p>The settlement assessment is a useful tool in identifying the most appropriate locations to direct major new employment and housing growth. Specifically we consider that Eccleshall represents one of the strongest performing Key Service Villages where new development can be accommodated.</p>
42	Jackson, J.	<p>Cleaning up land for regeneration should be seriously investigated. Since there is usually some transport access for previous use, linking this to existing transport links should also be looked into. In addition, current development of brownfield sites should be extended, possibly by building upwards. This does not just mean flats/apartments, but what about maisonettes (i.e. 2-storey buildings incorporating houses on 2 floors. Finally, there will come a point, if the whole of Stafford borough is not to be bricked over, when the limit is reached!</p>
44	Colwich Parish Council	<p>The Borough Council should, firstly, provide incentives for developers to use brown field sites, where presently the cost is too prohibitive to clean up and use the site. Secondly, the Borough Council should accept offers of land to ensure a five year land bank, but which do NOT try to change the agreed settlement boundaries in parishes that already have a Neighbourhood Plan in place.</p>
46	Stephen Locke Associates on behalf of landowners	<p>If the Council cannot find enough suitable brownfield sites, it should look to sustainable greenfield sites or sites that can be made sustainable through the provision of appropriate services and facilities.</p> <p>Ideally, if a greenfield site is identified, it should be located appropriately to support the role that town centres play as the heart of their communities, by taking a positive approach to their growth management and adaptation.</p>
48	GVA on behalf of St Philips	<p>Paragraph 117 of the Revised National Planning Policy Framework 2018 sets out that “planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much as use as possible of previously-developed or ‘brownfield’ land.”</p> <p>Furthermore, Chapter 13 of the new Framework affords great importance to the retention, protection and enhancement of designated Green Belts, noting that the fundamental aim of Green Belt policy is “to prevent urban sprawl by keeping land permanently open.”</p> <p>Paragraph 143 states that “inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.”</p> <p>Therefore, should the Council not be able to find enough suitable Brownfield sites to meet housing and employment need across the Borough, they should seek to direct development to alternative, Greenfield sites, which do not harm or interfere with Stafford’s defined Green Belt.</p> <p>As demonstrated throughout the supporting Vision Document the proposed development site, whilst not Brownfield, presents a sustainable development option which is available and deliverable now to support housing needs within the Borough. The Vision Document clearly sets out the self-contained nature of the site, its proximity to local services and amenities, together with public transport opportunities.</p> <p>Most importantly, the site does not require release from the Green Belt and will be supported a landscape strategy to ensure the rural character of Eccleshall is maintained and enhanced, where appropriate.</p>
49	Staffordshire County Council	<p>Education</p> <p>From an education perspective development should be considered on sites of sufficient size to be able to support the provision of infrastructure and local amenities necessary.</p>
50	Staffordshire Wildlife Trust (SWT)	<p>New greenfield sites should be chosen based on their sustainability, which includes soil conservation, biodiversity impacts and potential to enhance ecological networks, as well as transport and infrastructure factors. A map of environmental constraints and opportunities, including areas for enhancement, would help identify suitable sites. This is called for in the NPPF in terms of mapping of ecological networks.</p>
51	Wardell Armstrong on behalf of Barratt Homes and David Wilson Homes Mercia	<p>The revised NPPF states that the Council should make as much use as possible of previously developed land (para 117). The existing supply of previously developed land is however reducing as fast as available sites come forward for development. It should be noted that only one brownfield site in Stone is included in the most recent Brownfield Land Register for Stafford Borough. This is currently a small employment site with outline permission for 11 dwellings which has not come forward for housing since receiving outline permission back in 2007.</p>

Response Reference	Full name of respondent	Comments
		<p>This reliance on brownfield sites will be a significant risk as the availability of such sites declines over time. Furthermore, the artificial constraint of housing on greenfield sites will not ensure delivery of unviable brownfield sites and it is likely to inhibit the delivery of affordable housing.</p> <p>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 (para.23).</p> <p>We previously welcomed the statement at 7.21 of the SHELAA methodology consultation which confirmed that sites which may be considered 'unsuitable' under the existing planning policy regime will now be assessed objectively where they are adjacent to an existing settlement as this may allow the reasonable expansion of settlements, such as Stone, in a sustainable manner.</p>
52	GVA on behalf of Taylor Wimpey	<p>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).</p> <p>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.</p>
53	Wardell Armstrong on behalf of Dean Lewis Estates	<p>The allocation of the Cold Meece site as major brownfield regeneration opportunity for housing and associated community facilities will be of major benefit to the Council in demonstrating accordance with the government's national policy to prioritise the development of redundant brownfield sites that have good access to existing services for new housing.</p> <p>In the instance where the Council has insufficient redundant brownfield sites that have good access to existing services for new housing and employment it should look to the most suitable alternative suitable locations that avoid the high level national and locally identified environmental and spatial designations, such as Green Belt, AONB, SSSI.</p>
54	Lefroy, J. MP	<ul style="list-style-type: none"> • Brownfield sites for housing and employment should include empty retail property which are unlikely to be reused as retail. Stafford Town centre has many such sites which should be given priority for development. • Greenfield sites should only be allocated for development when the supply of brownfield sites has clearly been exhausted. It makes no sense to continue to build on greenfield sites (other than those already allocated) on the outskirts of Stafford when there is the potential for considerable redevelopment for commercial and residential use. • As stated above, the Borough should create Greenbelt land between Stafford and Stone to create boundaries to outward development.
56	Home Builders Federation (HBF)	<p>National policy does not state that the Council should prioritise brownfield sites. The revised NPPF states that the Council should make as much use as possible of previously developed land (para 117). However there are associated risks with an over reliance on brownfield sites because as a finite resource the availability of such sites will decline over time. Furthermore the artificial constraint of housing on greenfield sites will not ensure delivery of unviable brownfield sites and it may inhibit the delivery of affordable housing.</p> <p>The strategic policies of the new Local Plan should provide a clear strategy for bringing sufficient land forward and at a sufficient rate to address housing needs over the plan period including planning for and allocating sufficient sites to deliver strategic priorities (revised NPPF para 23). The Council should have a clear understanding of land availability in the Borough by preparing a strategic housing land availability assessment which should be used to identify sufficient supply and mix of sites taking account of availability, suitability and economic viability. The policies of the new Local plan should identify a supply of specific deliverable sites for years 1 – 5 of the plan period and specific developable sites or broad locations for growth for years 6 – 10 and where possible years 11 – 15 (revised NPPF para 67). The Council should also identify at least 10% of the housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target (para 68). The new Local Plan should include a trajectory illustrating the expected rate of housing delivery over the plan period. A minimum 5 years supply of specific deliverable sites including a buffer should be maintained (paras 73 & 74).</p> <p>For the Council to maximize housing supply the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increasing housing supply is increasing the number of sales outlets whilst large strategic sites may have multiple outlets usually increasing the number of sales outlets available inevitably means increasing the number of housing site allocations. Large strategic sites should be complimented by smaller scale non-strategic sites. This approach is also advocated in the Housing White Paper "Fixing the Broken Housing Market" because a good mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector.</p> <p>The Council should also apply a flexibility contingency to its overall housing land supply (HLS) in order that the new Local Plan is responsive to changing circumstances and the housing requirement is treated as a minimum rather than a maximum ceiling. The HBF acknowledge that there can be no numerical formula to determine the appropriate quantum for a flexibility contingency but where a Local Plan or a particular settlement or locality is highly dependent upon one or relatively few large strategic sites greater numerical flexibility is necessary than in cases where supply is more diversified. As identified in Sir Oliver Letwin's interim findings large housing sites may be held back by numerous constraints including discharge of pre-commencement planning conditions, limited availability of skilled labour, limited supplies of building materials, limited availability of capital, constrained logistics of sites, slow speed of installation by utility companies, difficulties of land remediation, provision of local transport infrastructure, absorption sales rates of open market housing and limitations on open market housing receipts to cross subsidise affordable housing. Therefore the HBF suggests as large a contingency as possible (at least 20%) because as any proposed contingency becomes</p>

Response Reference	Full name of respondent	Comments
		smaller so any in built flexibility reduces. If during the new Local Plan Examination any of the Council's assumptions on lapse rates, windfall allowances and delivery rates were to be adjusted or any proposed housing site allocations were to be found unsound then any proposed contingency would be eroded. The DCLG presentation slide from the HBF Planning Conference September 2015 (see below) which illustrates a 10 – 20% non-implementation gap together with 15 – 20% lapse rate. The slide also suggests "the need to plan for permissions on more units than the housing start / completions ambition".
57	Pegasus Group on behalf of Richborough Estates, Gnosall	If the housing and employment needs of the Borough cannot be met on brownfield land, then the Council should look to suitable greenfield sites in sustainable locations which could be brought forward for development.
58	Pegasus Group on behalf of Richborough Estates, Weston	If the housing and employment needs of the Borough cannot be met on brownfield land, then the Council should look to suitable greenfield sites in sustainable locations which could be brought forward for development.
59	Pegasus Group on behalf of Richborough Estates, Stone	If the housing and employment needs of the Borough cannot be met on brownfield land, then the Council should look to suitable greenfield sites in sustainable locations which could be brought forward for development.
60	Pegasus Group on behalf of Lovell Partnerships	If the housing and employment needs of the Borough cannot be met on brownfield land, then the Council should look to suitable greenfield sites in sustainable locations which could be brought forward for development.
61	Savills on behalf of Lord Stafford Estates	The Council should focus on providing new development opportunities in the most sustainable settlements with an appropriate range of services, facilities and access to employment opportunities. The Settlement Assessment is a useful tool in identifying the most appropriate locations to direct housing growth. In particular, Yarnfield (identified as a Large Village in the Settlement Assessment) provides a strong location for major housing growth due to its current function as a key service centre. Medium and smaller settlements, such as Swynnerton and Cold Meece, also provide sustainable opportunities for growth.
62	Knights on behalf of Jonathan Lloyd Developments Ltd	If the Council cannot find sufficient PDL sites to meet the need for housing and employment requirements then, in accordance with paragraph 117 of the Framework, it should firstly consider sites that contain a mix of brownfield and greenfield land before considering sites that are entirely greenfield. Our client's land at Hixon Airfield presents an excellent opportunity - that is unique to the Borough - to deliver meaningful contributions of housing and employment development and associated community facilities and infrastructure improvements (as set out in more detail in our January 2018 Call for Sites submissions) within a former airfield that comprises a mix of brownfield and greenfield land. In doing so the development that could be accommodated within the site could in turn reduce the pressure on Stafford, Stone and other larger villages with less obvious and suitable meaningful development opportunities to accommodate the development needs of the Borough to 2040.
65	Hinson Parry & Company	National policy does not state that brownfield development should be "prioritised." Instead, paragraph 117 of the NPPF (2018) states that plans should seek to meet objectively assessed need in a way that "makes as much use as possible of previously-developed or 'brownfield' land." That is distinct from saying that brownfield sites should be developed first, or as a priority. When identifying brownfield sites for development, care should be taken to ensure that they are deliverable and — in particular — that their development is viable. While there are obvious sustainability benefits to redeveloping brownfield sites that is just one factor to be taken into account - consideration should also be given as to whether alternative sites would lead to a more sustainable pattern of development "in the round." Where there are not enough brownfield sites to meet development needs then, in accordance with national policy, the council should look to identify greenfield sites for development in order to meet housing need. Sites in the open countryside should be prioritised over those in the Green Belt.
66	Natural England	Natural England will continue to work with the Council on the sustainability appraisal aspects of the new local plan for those themes and issues within our remit.
67	Hopton and Coton Parish Council	The Borough Council should look more closely at people who want to build small infill developments

Question 7: National policy encourages Local Plans to plan positively for a mix of housing, based on the demographic of people that live in the Borough both now, and the expected future population. What types of housing do you think will be most needed in the Borough over the coming years?

Response Reference	Full name of respondent	Comments
3	Bramall, S.	The last few years have seen a large number of starter homes / family homes – but other parts of the population have been neglected. Given the aging population, there is a desperate shortage of bungalows. On rightmove there are only 23 bungalows today. A small number of 'grand designs' houses should be welcomed to attract entrepreneurs / high-fliers who create jobs – if Stafford is to compete with Shropshire and Cheshire. There was nothing inspiring on Rightmove (7 August) – just 4 houses over £600,000 within 5 miles of Stafford. Compare to 21 houses within 5 miles of Shrewsbury or 49 houses within 5 miles of Chester – and yet Stafford's rail links are far superior.

Response Reference	Full name of respondent	Comments
18	Tetlow King Planning	Ageing Population The Council should seek to understand the scale of need for older persons' accommodation through detailed analysis of the Borough's ageing demographic as it is clear that there is a significant projected increase across England. It is vital that the Council ensures its evidence considers the range of housing models which may be required, as guided by the PPG (which is currently being updated to reflect the revised NPPF). The Council should also assess the level of specialist older persons' affordable housing needs to inform policy. Once this has been assessed the evidence should be translated to a separate policy fully representing the need for specialist housing and care for older people in Stafford Borough. An exemplar policy is set out below for guidance: "The Council will, through the identification of sites and/or granting of planning consents, provide for the development of residential care homes, nursing homes, close care, extra care and assisted care housing, and Continuing Care Retirement Communities which encompass an integrated range of such provision. In identifying sites and/or determining planning applications, regard will be had to: • Commission for Social Care Inspection and other operational requirements; • Locational sustainability. Suitable sites at defined settlements will be prioritised, but where such sites are not available, regard will be had to the availability of public transport and the potential for developments to be self-contained, thereby reducing travel requirements; • The potential to co-locate a nursing/residential care home and other care related accommodation on the site where there are demonstrated needs."
21	Seddon Homes	Whilst it is important that a mix of housing is provided to meet the needs of a community, each site and scheme should be treated on an individual basis in terms of the final mix delivered. This will allow schemes to be tailored to meet the needs of the community at that moment in time and respond to market conditions. The intention is that the new Local Plan covers a period from 2020 to 2040 and it is likely that housing needs will change over this twenty-year period. Therefore, having ridged policies that require a specific mix of housing to be provided could quickly become dated and not achieve the objective of meeting the needs of the community; therefore, such policies are not supported.
23	Eccleshall Parish Council	Provision of bungalows and smaller houses that can be bought for people wishing to downsize. This housing should be for sale as opposed to social housing rental schemes.
28	Banham, D.	The demographic trend is for an increasing elderly population. Building houses that older people can "down size" into will free up family size homes. Typically what most older people will aspire too is a bungalow (and not apartments/flats). Hence the plan should seek to increase the percentage of bungalow properties in the town.
36	Ingestre with Tixall Parish Council	We suggest small starters for young people and pensioners. Affordable housing should be planned to remain affordable and not be allowed to be extended, and thus increase in price in the future.
38	Indigo Planning on behalf of CEG	There should be flexibility for sites to deliver a mix of housing which meets the demands and needs of the local community at that time. These needs and demands will change over time and over the twenty year plan period, therefore, any future policies will need to take this into account and be sufficiently flexible. Ensuring flexibility in the mix of housing delivered accords with the provisions of the revised NPPF, which states at paragraph 59 "it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed". Allowing sites and schemes to dictate the mix of housing will enable the "specific housing requirements" at that time to be addressed, as opposed to having a rigid policy requiring a specific mix, based on the needs when the plan was adopted.
39	Savills on behalf of Eccleshall landowners	The new Local Plan should make provision for flexibility to allow a mix of housing types to be provided. This should be based on the latest evidence, for example the SHMAA. Although evidence based, the plan should not be overly prescriptive in dictating required housing mixes and each site should be assessed on its individual characteristics and location. This flexibility is required to ensure that the right housing product is provided in the most appropriate location. Therefore a generic mix for the whole district would not provide an appropriate degree of flexibility on mix and dwelling type. This is important to ensure that locations for new housing identified as suitable in the new local plan can be delivered appropriately.
42	Jackson, J.	Forecasts suggest homes for older people, some with facilities for those experiencing mobility problems will be in demand. This could be catered for through sheltered housing, retirement villages, and bungalows
44	Colwich Parish Council	There will be most need for affordable housing, single occupancy dwellings and homes for the elderly. These types of housing should be encouraged over the coming years. There should be proper enforcement of these types of property and developers should not be allowed to avoid this commitment by the use of various devices.
46	Stephen Locke Associates on behalf of landowners	We know there is a significant demographic shift with both the number and proportion of older people increasing. It is important to recognise population changes and projections and to provide a mix of homes to meet the needs of different groups such as families with children, older people and single people and those with disabilities and those with care support needs. The Borough needs to plan to meet the needs and demands of a varying population such as the provision of lifetime homes, age-appropriate housing and the adaptation of homes to enable people to live in their own homes for longer. In terms of types of housing, this will need to be a mix of sizes and types to meet current and future needs.
51	Wardell Armstrong on behalf of Barratt Homes and David Wilson Homes Mercia	When planning for an acceptable mix of dwellings types to meet people's housing needs the Council should focus on ensuring that there are appropriate sites allocated, in term of size and location, to meet the needs of the inhabitants of the Borough without seeking a specific housing mix on individual sites.

Response Reference	Full name of respondent	Comments
		The diverse housing needs of the people of the Borough is best met in the new Local Plan by ensuring that suitable sites are available for a wide range of developments across a wide choice of locations rather than seeking a specific mix on individual sites.
52	GVA on behalf of Taylor Wimpey	A range of housing of housing types, sizes and tenures will be required during the plan period. 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.
53	Wardell Armstrong on behalf of Dean Lewis Estates	The demographic change within SBC population within the 15 years indicates higher levels of persons above the age of 65 forming a greater proportion of the resident population in this period. For this reason, elderly persons accommodation should be supported in the new Local Plan Policy where there is good access to local services and facilities. With regard to custom and self-build a flexible policy approach should be introduced to encourage areas of sites to be annexed for self-build projects. An overall policy approach within the plan of circa 2% of dwellings to be provided to be from self-build projects. It would then be appropriate to assess each scheme thereafter having regard to the ability of each site to deliver such provision or to demonstrate reasoning regarding appropriateness.
54	Lefroy, J. MP	<ul style="list-style-type: none"> • Single story accommodation without or with limited garden/patio space, particularly for older people who wish to stay in the area close to their families. With the age profile in the Borough, many will wish to downsize to such properties, freeing up larger family homes. • Homes built specifically to permit working from home. These would have an office/study with bathroom facilities and a separate entrance. This would encourage entrepreneurs to set up or stay in the Borough. Such homes would also be suitable for a family which wished an older relative to live with them. • The Borough should insist on a high quality of design and not simply accept the very limited range of designs which developers often propose. The Arts and Crafts Movement (of which Stafford has many fine examples) should be an inspiration. • Homes should build in sustainability. Rainwater capture, solar panels and the most energy efficient glazing should be standard for all or almost all properties. These are much cheaper to build in when new than to retrofit.
56	Home Builders Federation (HBF)	The preparation and review of housing policies should be underpinned by relevant and up to date evidence which supports and justifies the policies concerned (revised NPPF para 31). The housing needs for different groups should be assessed to justify any policies on the size, type and tenure of housing including a need for affordable housing (revised NPPF paras 61 & 62). The new Local Plan should deliver housing to meet the full range of local needs including affordable housing and specialist housing. The HBF recognise that all households should have access to different types of dwellings to meet their housing needs. When planning for an acceptable mix of dwellings types to meet people's housing needs the Council should focus on ensuring that there are appropriate sites allocated to meet the needs of specifically identified groups of households such as the elderly without seeking a specific housing mix on individual sites. Indeed the housing needs of older people is a diverse sector so the new Local Plan should be ensuring that suitable sites are available for a wide range of developments across a wide choice of appropriate locations. The Written Ministerial Statement 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". If the Council wishes to adopt any of the higher optional standards for accessible & adaptable homes and / or the Nationally Described Space Standard (NDSS) then the Council should only do so by applying the criteria set out in the NPPG. It is incumbent on the Council to provide a local assessment evidencing and justifying its case of the inclusion of such policy requirements and the quantum thereof. The Borough's ageing population is not unusual and is not a phenomenon specific to Stafford. The optional higher standards should only be introduced on a "need to have" rather than "nice to have" basis. The Council should also consider the potential unintended consequence of encouraging the under-occupation of its housing stock by discouraging older households from moving.
57	Pegasus Group on behalf of Richborough Estates, Gnosall	The new Local Plan should deliver housing to meet the full range of local needs, including affordable and specialist housing, in addition to un-met need arising from neighbouring authorities. Richborough Estates submits that, whilst it is important to identify a wide range of sites for housing, larger sites of around 50 or more dwellings provide the greatest level of opportunity to provide for a mix of housing in terms of size, type and tenure. Richborough Estates also submits that a specific housing mix should not be specified in any Local Plan Policy, which only presents snapshot in time. Instead, Policy should direct the reader to the latest evidence base, such as the Strategic Housing Market Assessment (SHMA), which should be routinely updated across the Plan Period. This ensures that housing mix is reflective of market-driven need.
58	Pegasus Group on behalf of Richborough Estates, Weston	The new Local Plan should deliver housing to meet the full range of local needs, including affordable and specialist housing, in addition to un-met need arising from neighbouring authorities. Richborough Estates submits that, whilst it is important to identify a wide range of sites for housing, larger sites of around 50 or more dwellings provide the greatest level of opportunity to provide for a mix of housing in terms of size, type and tenure. Richborough Estates also submits that a specific housing mix should not be specified in any Local Plan Policy, which only presents snapshot in time. Instead, Policy should direct the reader to the latest evidence base, such as the Strategic Housing Market Assessment (SHMA), which should be routinely updated across the Plan Period. This ensures that housing mix is reflective of market-driven need.
59	Pegasus Group on behalf of Richborough Estates, Stone	The new Local Plan should deliver housing to meet the full range of local needs, including affordable and specialist housing, in addition to un-met need arising from neighbouring authorities. Richborough Estates submits that, whilst it is important to identify a wide range of sites for housing, larger sites of around 50 or more dwellings provide the greatest level of opportunity to provide for a mix of housing in terms of size, type and tenure. Richborough Estates also submits that a specific housing mix should not be specified in any Local Plan Policy, which only presents snapshot in time. Instead,

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		Policy should direct the reader to the latest evidence base, such as the Strategic Housing Market Assessment (SHMA), which should be routinely updated across the Plan Period. This ensures that housing mix is reflective of market-driven need.
60	Pegasus Group on behalf of Lovell Partnerships	The new Local Plan should deliver housing to meet the full range of local needs, including affordable and specialist housing, in addition to un-met need arising from neighbouring authorities. Lovell Partnerships submits that, whilst it is important to identify a wide range of sites for housing, larger sites provide the greatest level of opportunity to provide for a mix of housing in terms of size, type and tenure. Lovell Partnerships also submits that a specific housing mix should not be specified in any Local Plan Policy, which only presents snapshot in time. Instead, Policy should direct the reader to the latest evidence base, such as the Strategic Housing Market Assessment (SHMA), which should be routinely updated across the Plan Period. This ensures that housing mix is reflective of market-driven need.
61	Savills on behalf of Lord Stafford Estates	The new Local Plan should make provision for flexibility to allow a mix of housing types to be provided. This should be based on the latest evidence, for example the SHMAA. Although evidence based, the plan should not be overly prescriptive in dictating required housing mixes and each site should be assessed on its individual characteristics and location. This flexibility is required to ensure that the right housing product is provided in the most appropriate location. Therefore a generic mix for the whole district would not provide an appropriate degree of flexibility on mix and dwelling type. This is important to ensure that locations for new housing identified as suitable in the new local plan can be delivered appropriately.
62	Knights on behalf of Jonathan Lloyd Developments Ltd	We do not consider that any specific types of housing are most needed in the Borough, but that in the interests of achieving the sustainable growth of the Borough and other key objectives/outcomes outlined in responses to questions 1 and 2, it would be expedient for the new Local Plan to encourage and facilitate the delivery of a wide range of types of housing in a variety of locations across the Borough. This should include the delivery of greater levels of housing in the rural area that are of a type/design and density that respect their local setting - and the delivery of sufficient housing to meet the needs of the ageing population (as highlighted in the consultation document) is an important objective. A good proportion of new housing for older people will need to be accommodated in the rural area and it is considered important for the new Local Plan to acknowledge and plan for this and the maintain and where possible enhancing of local community facilities to serve such residents and the rural population overall. Given the scale of our client's land at Hixon Airfield it clearly has the ability to accommodate a good number and mix of housing and to deliver additional community facilities to serve and enhance the quality of life of existing and new residents in and around the village.
65	Hinson Parry & Company	The need for different types of housing should be established through empirical research which is published for consultation. Notwithstanding the outcome of any such consultation, adequate flexibility needs to be incorporated into planning policies to allow developers to reflect market demand in their housing schemes and to quickly respond to market signals.
67	Hopton and Coton Parish Council	There will be most need for affordable housing, single occupancy dwellings and homes for the elderly. These types of housing should be encouraged over the coming years. There should be proper enforcement of the required proportion of these types of property and developers should not be allowed to avoid this commitment by the use of various devices.

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?

Response Reference	Full name of respondent	Comments
3	Bramall, S.	Why restrict self-builders to plots on large development sites? It is likely that any developer will make the plots high density as that is how they maximise their return on investment. They are likely to price the plots high to make up for the margin that they lose by not building. Also, they will use every trick in the book to get out of this – in the same way that they reduce the number of affordable homes that they are supposed to provide. Why not encourage self-build on infil plots?
21	Seddon Homes	The Stafford Borough Self-Build and Custom Housebuilding Register (October 2017) has only 25 entries of people registering an interest in obtaining a self-build plot. Of these 25; only four identified Stafford as the location for the required plot. This evidence suggests there is limited interest and appetite for self-build plots across the Borough, but in particular within Stafford. Based on this evidence, we would not support a policy requiring a percentage of large sites to be made available for self-build; as there is currently only very limited demand. Reserving parts of the developable area of a site for self-build where there is no interest for it, is likely to affect overall scheme viability as these reserved areas are likely to remain empty. At this stage, there is no evidence to support a percentage of large sites being reserved for self-build plots.
38	Indigo Planning on behalf of CEG	Providing a good mix of dwelling types and sizes is important in terms of ensuring that the needs of the community and overall Borough are met. In terms of whether there is a community / Borough need for self-build plots needs to be based on robust evidence. The Stafford Borough Self-Build and Custom Housebuilding Register (October 2017) has only 25 entries of people registering an interest in obtaining a self-build plot. With regards to the preferred locations for these plots, out of the 25 entries, Stafford was only identified by four people. This evidence indicates that there is

Response Reference	Full name of respondent	Comments
		<p>only very limited interest and requirement for self-build plots not just in Stafford Town but across the Borough as a whole. Based on the evidence currently available, there is no clear indication of a need for self-build plots; in short, there is no evidence to justify a requirement for large sites to reserve areas for self-build plots. If large sites were required to reserve areas for self-build plots, then as there is currently no interest or demand, this could mean these reserved areas remain empty.</p> <p>On the basis of the above, there is objection to any policy which requires a specific percentage of large sites to be reserved for self-build plots and any such policy should not be carried forward due to a lack of evidence and justification.</p>
39	Savills on behalf of Eccleshall landowners	Self-build may provide an attractive option for some, but it is not clear how the design and construction of these proposals will be appropriately managed. Furthermore, on large development sites, there is a question mark over how self-build could affect delivery rates. More information is required on delivery and how appropriate local plan policies will be applied.
42	Jackson, J.	I would suggest 1% on new developments comprising over 100 dwellings, if necessary. However, it is difficult to see how this will work, for instance, the consistency in styles could be variable.
44	Colwich Parish Council	Self-build would be very popular. 20% of large sites could be allocated to self-build in order to encourage sustainable innovation. Builders should not allowed to overcharge for the land.
46	Stephen Locke Associates on behalf of landowners	It is recognised that demand exists for self-build development plots, however with regard to their provision within a large site, these sites need to be carefully identified to ensure they will be developed sustainably and to a high-quality design. Challenges exist with the provision of self-build sites within larger sites. These include consistency of design, timescale of construction, site safety and access, the economic viability of the sale of individual plots within a larger development.
48	GVA on behalf of St Philips	Our client is supportive, in principle, that a percentage of large sites should make available land to accommodate those listed on the Stafford Borough Self-build and Custom Housebuilding Register. At present there are currently 26 individuals with a registered interest requiring a variety of plot sizes in numerous locations across the Borough. Of the 26 registered, 14 have expressed an interest in self-build plots in Eccleshall, equating to approximately 4.02 hectares. It is considered that whilst the existing register demonstrates only a low number of individuals interested in obtaining land for self-build and custom build dwellings, this could increase following the adoption of the plan. Therefore, the introduction of a policy that requires sites of over 20 dwellings or more to accommodate the need, where applicable, would ensure the land is safeguarded for this use.
51	Wardell Armstrong on behalf of Barratt Homes and David Wilson Homes Mercia	<p>The NPPG confirms that “different types of residential development such as those wanting to build their own homes ... are funded and delivered in different ways. This should be reflected in viability assessments” (ID 10-009).</p> <p>The assessment of housing needs in its SHMA work as set out in the NPPG (ID 2a-021) should be undertaken with evidence from reliable local information (including registrations on the Council’s Self / Custom Build Register) to indicate the demand from people wishing to build their own homes.</p> <p>The Council should also analyse the preferences of entries on the Self Build Register. It is often the case that only individual plots in specific, typically rural locations are sought as opposed to plots on larger housing sites and a more refined policy approach may be necessary for self-build to reflect this evidence base.</p>
52	GVA on behalf of Taylor Wimpey	<p>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.</p> <p>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.</p>
53	Wardell Armstrong on behalf of Dean Lewis Estates	<p>The demographic change within SBC population within the 15 years indicates higher levels of persons above the age of 65 forming a greater proportion of the resident population in this period. For this reason, elderly persons accommodation should be supported in the new Local Plan Policy where there is good access to local services and facilities.</p> <p>With regard to custom and self-build a flexible policy approach should be introduced to encourage areas of sites to be annexed for self-build projects. An overall policy approach within the plan of circa 2% of dwellings to be provided to be from self-build projects. It would then be appropriate to assess each scheme thereafter having regard to the ability of each site to deliver such provision or to demonstrate reasoning regarding appropriateness.</p>
54	Lefroy, J. MP	I strongly agree that the new local plan should encourage self-build and at least 10% of all large sites should be put across for self-build. In addition, the Borough should look to acquire smaller sites for self-build. There is a considerable appetite for self-build among my constituents and this will only grow as people see the attraction of it. It will also provide work and employment to good local building firms.
56	Home Builders Federation (HBF)	<p>The HBF is supportive of proposals to encourage self / custom build for its potential additional contribution to the overall housing supply. It is noted that policies which encourage self / custom build have been endorsed in a number of recently published Inspector’s Final Reports for East Devon Local Plan, Warwick Local Plan, Bath & North East Somerset Place-making Plan and Derbyshire Dales Local Plan.</p> <p>The HBF is not supportive of restrictive policy requirements for the inclusion of self / custom build housing on other residential development sites such as sites with a threshold greater than 20 dwellings under consideration by the Council. This approach only changes housing delivery from one form of house building company to another without any consequential additional contribution to boosting housing supply. If these plots are not developed by self / custom builders then these undeveloped plots are effectively removed from the HLS unless the Council provides a mechanism by which these dwellings may be developed by the</p>

Response Reference	Full name of respondent	Comments
		<p>original non self / custom builder in a timely manner. Before introducing any such policy the Council should also give consideration to the practicalities of health & safety, working hours, length of build programme, etc. as well as viability assessing any adverse impacts. The NPPG confirms that “different types of residential development such as those wanting to build their own homes ... are funded and delivered in different ways. This should be reflected in viability assessments” (ID 10-009). The Council should also consider the impact of loss of Community Infrastructure Levy (CIL) contributions as self / custom build properties are exempt. Any policy requirement for self / custom build serviced plots on residential development sites should be fully justified and supported by evidence. If the Council wishes to promote self / custom build it should do so on the basis of evidence of need. The Council should assess such housing needs in its SHMA work as set out in the NPPG (ID 2a-021) collating from reliable local information (including the number of validated registrations on the Council’s Self / Custom Build Register) the demand from people wishing to build their own homes. The Council should also analyse the preferences of entries on the Self Build Register often only individual plots in specific usually rural locations are sought as opposed to plots on larger housing sites. The Register may not provide the justification for the Council’s proposed policy approach for a percentage on other housing sites. Perhaps the Council should consider an alternative policy approach such as self / custom build plot exception sites in rural areas.</p>
57	Pegasus Group on behalf of Richborough Estates, Gnosall	<p>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 their own self-build and custom house building. Authorities are also subject to duties under sections 2 and 2A of the Act to have regard to this and to give enough suitable development permissions to meet the identified demand.</p> <p>Given that authorities are required to maintain a register of demand for self-build housing, it would be inappropriate to include a blanket percentage within a Local Plan policy, particularly when the demand for self-build housing is susceptible to fluctuation through market demand. At any point during the plan period, it is feasible that demand for self-build housing could fall, either in line with market conditions, or due to provision of a sufficient number of plots elsewhere within the Borough. In such a scenario, with a blanket percentage in force, further housing sites would come forward with self-build plots which have no realistic prospect of being developed. This approach would not, therefore, achieve the most efficient use of land, as required by the NPPF, to the detriment of the Borough’s overall housing requirement.</p> <p>Instead, it would be appropriate to secure self-build plots directly in line with demand. Policy should therefore be flexible and direct the reader to the most up-to-date evidence in respect of the demand for self-build plots, as per the requirements in respect of market and affordable housing mix.</p>
58	Pegasus Group on behalf of Richborough Estates, Weston	<p>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 their own self-build and custom house building. Authorities are also subject to duties under sections 2 and 2A of the Act to have regard to this and to give enough suitable development permissions to meet the identified demand.</p> <p>Given that authorities are required to maintain a register of demand for self-build housing, it would be inappropriate to include a blanket percentage within a Local Plan policy, particularly when the demand for self-build housing is susceptible to fluctuation through market demand. At any point during the plan period, it is feasible that demand for self-build housing could fall, either in line with market conditions, or due to provision of a sufficient number of plots elsewhere within the Borough. In such a scenario, with a blanket percentage in force, further housing sites would come forward with self-build plots which have no realistic prospect of being developed. This approach would not, therefore, achieve the most efficient use of land, as required by the NPPF, to the detriment of the Borough’s overall housing requirement.</p> <p>Instead, it would be appropriate to secure self-build plots directly in line with demand. Policy should therefore be flexible and direct the reader to the most up-to-date evidence in respect of the demand for self-build plots, as per the requirements in respect of market and affordable housing mix.</p>
59	Pegasus Group on behalf of Richborough Estates, Stone	<p>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 their own self-build and custom house building. Authorities are also subject to duties under sections 2 and 2A of the Act to have regard to this and to give enough suitable development permissions to meet the identified demand.</p> <p>Given that authorities are required to maintain a register of demand for self-build housing, it would be inappropriate to include a blanket percentage within a Local Plan policy, particularly when the demand for self-build housing is susceptible to fluctuation through market demand. At any point during the plan period, it is feasible that demand for self-build housing could fall, either in line with market conditions, or due to provision of a sufficient number of plots elsewhere within the Borough. In such a scenario, with a blanket percentage in force, further housing sites would come forward with self-build plots which have no realistic prospect of being developed. This approach would not, therefore, achieve the most efficient use of land, as required by the NPPF, to the detriment of the Borough’s overall housing requirement.</p> <p>Instead, it would be appropriate to secure self-build plots directly in line with demand. Policy should therefore be flexible and direct the reader to the most up-to-date evidence in respect of the demand for self-build plots, as per the requirements in respect of market and affordable housing mix.</p>
60	Pegasus Group on behalf of Lovell Partnerships	<p>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 their own self-build and custom house building. Authorities are also subject to duties under sections 2 and 2A of the Act to have regard to this and to give enough suitable development permissions to meet the identified demand.</p> <p>Given that authorities are required to maintain a register of demand for self-build housing, it would be inappropriate to include a blanket percentage within a Local Plan policy, particularly when the demand for self-build housing is susceptible to fluctuation through market demand. At any point during the plan period, it is feasible that demand for self-build housing could fall, either in line with market conditions, or due to provision of a sufficient number of plots elsewhere within the Borough. In such a scenario, with a blanket percentage in force, further housing sites would come forward with self-build plots which have no realistic prospect of</p>

Response Reference	Full name of respondent	Comments
		being developed. This approach would not, therefore, achieve the most efficient use of land, as required by the NPPF, to the detriment of the Borough's overall housing requirement. Instead, it would be appropriate to secure self-build plots directly in line with demand. Policy should therefore be flexible and direct the reader to the most up-to-date evidence in respect of the demand for self-build plots, as per the requirements in respect of market and affordable housing mix.
61	Savills on behalf of Lord Stafford Estates	On large development sites, there is a question mark over how self-build could affect delivery rates. More information is required on delivery and how appropriate local plan policies will be applied. It is considered the provision of self-build plots should be left to the discretion of the developer based on market trends, which are liable to change over the Plan period. It should also be to the developer's discretion based on viability. It is appropriate for such provision to be encouraged through development proposals, subject to viability, rather than through policy, which would impose an unjustified requirement on developers.
65	Hinson Parry & Company	Self-build homes can be an important constituent of housing supply and should be encouraged in line with the level of need demonstrated by the council. The percentage of dwellings to be made available and the site size threshold should be established based on that assessment of need for self-build plots. To ensure that sites can be viably delivered, we would recommend that a "cascade" mechanism is included in any policy that allows the developer to construct the plot themselves if it has not been sold in a pre-defined period (say, 12 months). To ensure continuity of build, that would suggest a minimum site size threshold for this requirement of at least 70 dwellings (so around two years production).
67	Hopton and Coton Parish Council	Self-build projects have produced some good developments. Why put a number on it? We need to think about the price of land and we need more regulation in this sector.

Question 9: National policy states that the Council should prioritise the development of redundant brownfield sites that have good access to existing services for new housing which includes pitches for gypsies, travellers and travelling show people. Where should the Council look for suitable brownfield sites for new pitches?

Response Reference	Full name of respondent	Comments
3	Bramall, S.	Surely the council already knows where the brownfield sites are?
42	Jackson, J.	Given the history of animosity between transit and non-transit communities, perhaps it would be wise not to locate pitches in the midst of permanent residences. In time this may change, but people take time to accept one another and cannot be forced; when they are forced, then enmity tends to escalate.
44	Colwich Parish Council	The same criteria should apply to gypsies and travellers as to any other group of people.
54	Lefroy, J. MP	It is important to provide pitches for gypsies, travellers and travelling show people in areas which are suitable for them and the local community. At the same time, when such pitches are available, the Council should, with the Police, ensure that these pitches are used and that parks/communal grounds or private property (without permission from the owner) are not, with anyone trespassing being immediately moved on.
67	Hopton and Coton Parish Council	The same criteria should apply to gypsies and travellers as to any other group of people.

Question 10: What are the main barriers to growth that need to be addressed in the Local Plan to ensure that all sections of the community have access to the benefits of future employment creation in the Borough?

Response Reference	Full name of respondent	Comments
3	Bramall, S.	High speed fibre broadband – not just fibre-to-the-cabinet which is a con. This is essential for businesses. Parking at the station is a major problem – which could at least be addressed by erecting signs as you enter the town to indicate which car parks have capacity. Parking in Eccleshall is a problem for those that work in the town and visitors coming to spend money in the shops. Business rates have killed the high streets in Stafford and Stone. Stafford town centre is now spread too wide, and it is hard to envisage it recovering without some radical changes – including more attractive architecture and landscaping. Making the bough better for tourists – walkers, cyclists, elderly will benefit everyone.
23	Eccleshall Parish Council	It is key to provide better transport networks throughout the Borough to allow resident access to opportunities.
28	Banham, D.	the town's road network is no longer fit for purpose - See answer to Qu 24.
36	Ingestre with Tixall Parish Council	Poor broadband and mobile phone coverage in the rural areas.
37	Knights on behalf of Birch House Lane Industrial Estate	Creating an increased focus to providing new residential and employment development within the rural areas (in locations that are or can be made sustainable) in accordance with paragraphs 78 and 83 of the Framework.

Response Reference	Full name of respondent	Comments
42	Jackson, J.	There seems to be an overemphasis on food/drink establishments in urban-type areas, while retail is not flourishing. Perhaps entertainment/tourism would fare better.
44	Colwich Parish Council	The main barriers are a lack of affordable, regular transport in the area and insufficient speed and capacity for broadband. There should be support for start-up costs and provision of realistically “affordable” housing.
46	Stephen Locke Associates on behalf of landowners	The Borough is well located and benefits from good quality transport links such as the M6 motorway and west-coast mainline rail route. This is both a blessing and a curse as it can encourage people to live in the Borough and commute to the larger settlements such as Birmingham, Stoke on Trent and the wider West-Midlands conurbation. A balance is required to ensure that suitable employment opportunities are available locally and that suitable housing and services are available for those people seeking such employment. The quality and availability of education is also considered as it is important to ensure that people within the Borough have the opportunity to meet their full potential which will hopefully ensure that they remain living and working within the borough and contribute to the sustainability of the local economy.
48	GVA on behalf of St Philips	It is clearly demonstrated through both national and local planning policy that a key barrier to employment growth includes the provision of housing. Namely, the Government’s Housing White Paper: Fixing our broken housing market, published in February 2017, sets out that “to boost housing supply and, over the long term, inter alia, a more efficient housing market whose outcomes more closely match the needs and aspirations of all households and which support wider economic prosperity [is required].” The White Paper sets out that as a result of not enough Local Authorities planning for the homes they need; house building being too slow; and the construction industry being too reliant on a small number of big players, there has been a significant under-delivery of new homes since the 1970s and house building has struggled to keep up with population growth. Consequently, “sky-high property prices stop people moving to where jobs are”, together with “low levels of housing building mean[ing] less work for everyone involved in the construction industry, inter alia, meaning less money gets spent in the wider economy.” The Revised NPPF 2018 further supports this, most notably at Paragraph 8, which sets out the three strands underpinning sustainable development, including objectives relating to the economic role; social role; and environmental role of development. The NPPF recognises that these overarching objectives are “interdependent and need to be pursued in mutually supportive ways” and they will be delivered through the preparation and implementation of plans. Thus, the delivery of new housing and the benefits that are afforded as a result of new development are intrinsically linked to the success of economic growth. In this context, the proposed development site would seek to provide a variety of economic benefits, namely the provision of both direct and indirect/supply chain construction jobs and during its operational lifetime through its resident population. The table below sets out the anticipated yield of employment opportunities based on a development of 20 dwellings with an average population size of 2.3 residents. [see table in full response] The figures within the table above demonstrate the economic benefits of the proposed development in terms of both economic prosperity and housing growth.
53	Wardell Armstrong on behalf of Dean Lewis Estates	The Local Plan Strategy should focus on providing new homes close to existing and proposed strategic employment locations. The employment linked to Cold Meece sits within an identified strategic employment corridor running from Eccleshall to Swynnerton. The Local Plan should allocate sufficient land at Cold Meece to redress the imbalance between the insufficiency of homes versus the high level of employment provision in this corridor. New housing development here will place homes close to existing and proposed employment and will serve to reinforce and enhance the existing public transport links to provide for sustainable community within this part of the borough. This policy approach will help to break down the barriers of access to employment and promote prosperity for the all of the community. Additional Employment land could be identified within this locality. Should the existing Swynnerton MoD Army Training Camp become available for development within the Plan period a comprehensive master plan for the redevelopment of the site should be devised to include provision for new homes employment and community uses as part of any mixed-use regeneration scheme.
54	Lefroy, J. MP	<ul style="list-style-type: none"> • Better transport infrastructure – both for both public and private transport – is essential. Improvements should be made before the start of any development, not halfway through or at the end. • All developments should have the needs of pedestrians, cyclists and wheelchair users as a priority – not just as a consideration. • All developments should be required to contribute to a public transport fund used to fund services such as community transport. • Growth should be taken in a holistic sense and defined as such. It is important that it includes but is not restricted to economic growth. It should also include improvements to air quality, health and education – in other words, general well-being.
62	Knights on behalf of Jonathan Lloyd Developments Ltd	Creating an increased focus on providing new residential and employment development within the rural areas (in locations that are or can be made sustainable) in accordance with paragraphs 78 and 83 of the Framework. The potential of our client’s land at Hixon Airfield to make a meaningful contribution in this respect has been outlined elsewhere in these representations and within our January 2018 Call for Sites submissions.
65	Hinson Parry & Company	Since the Barker Review in 2004, it has been clear that the absence of an adequate supply of homes can impact economic growth. The government’s standard method for determining housing targets produces a minimum figure which does not take any account of economic growth aspirations. Care should therefore be taken to ensure the housing target is sufficient to support and facilitate the borough’s economic growth aspirations — and to take

Response Reference	Full name of respondent	Comments
		advantage of the vast economic opportunity offered by HS2. The NPPF (2018) is clear that higher housing targets will be supported where councils propose them.
67	Hopton and Coton Parish Council	A major barrier to growth is road construction / infrastructure. Without this, no-one will be able to get to their place of work

Question 11: Do you think there is a need to identify additional land for employment and if so what types of employment uses should the Local Plan support and promote?

Response Reference	Full name of respondent	Comments
3	Bramall, S.	It is not possible to comment on this without some analysis of supply and demand from commercial property agents.
23	Eccleshall Parish Council	Additional land allocated for employment should have clear access to major arterial transport routes, rather than in rural areas where excessive HGV and commercial traffic is not suitable for the smaller roads. If better broadband connections were in rural areas, this would allow for the development of smaller businesses in areas outside of the town centre, and support the outlying key service villages.
28	Banham, D.	The town needs to attract high value employment across a range of activities and get away from consuming large plots of land with low value employment, such as warehousing. The town has a significant engineering heritage, which is now on the wane and needs to be reversed at least in the more general sense of the "knowledge economy". As it is, a significant percentage of the towns working population must be community elsewhere for their employment.
36	Ingestre with Tixall Parish Council	Need to encourage more people working from home, provided there is better broadband and mobile phone coverage.
37	Knights on behalf of Birch House Lane Industrial Estate	Yes, particularly within the rural area where it is necessary for new sites to be provided that can provide improved facilities including to meet modern business requirements in accordance with paragraphs 11 and 83 of the Framework.
42	Jackson, J.	Agriculture/farming should be supported, and perhaps wildlife, craft, and historical attractions for visitor. It is surprising that there is considerable effort in establishing new sectors to the area when there remain current employment sectors, for which a demand already exists, requiring more encouragement and support.
44	Colwich Parish Council	The availability of land for employment is sufficient in Staffordshire.
46	Stephen Locke Associates on behalf of landowners	It is crucial that additional land is allocated for employment uses. Sites should be located in accessible and well serviced locations. It is important that the Borough builds on its strengths, tries to counter any weaknesses and addresses the challenges of the future. One area for potential growth is expansion of new high-technology areas such as that in creative industries and insuring clean growth and encouraging new sectors to the Borough. As previously highlighted, the land to the south-west of Stone is a key location for new employment development, offering a sustainable location of such a scale that will enable the Borough to meet its anticipated needs over the next planning period. Stone is also increasingly becoming recognised for its food offer with a number of high-quality food establishments, the Stone Food and Drink Festival (20,000 visitors) and the towns historic links to the brewing industry. There is an opportunity to grow this reputation and potential by attracting food processors and food technology firms to the town. This could be achieved by the development of a new food and technology park on the land to the south west of the settlement.
53	Wardell Armstrong on behalf of Dean Lewis Estates	The Local Plan Strategy should focus on providing new homes close to existing and proposed strategic employment locations. The employment linked to Cold Meece sits within an identified strategic employment corridor running from Eccleshall to Swynnerton. The Local Plan should allocate sufficient land at Cold Meece to redress the imbalance between the insufficiency of homes versus the high level of employment provision in this corridor. New housing development here will place homes close to existing and proposed employment and will serve to reinforce and enhance the existing public transport links to provide for sustainable community within this part of the borough. This policy approach will help to break down the barriers of access to employment and promote prosperity for the all of the community. Additional Employment land could be identified within this locality. Should the existing Swynnerton MoD Army Training Camp become available for development within the Plan period a comprehensive master plan for the redevelopment of the site should be devised to include provision for new homes employment and community uses as part of any mixed-use regeneration scheme.
54	Lefroy, J. MP	<ul style="list-style-type: none"> • As above, the Borough should consider that homes are also employment sites for millions of self-employed people in the UK. Therefore the strict segregation between housing and employment land is out of date. It is possible to create hundreds of additional job spaces in the Borough simply by implementing 7b) above. • The Borough should resist any further developments for storage/distribution unless they are an essential part of other activities on the same or nearby sites such as manufacturing or R&D. • The Borough should promote employment in (renewable) energy, data, high-value manufacturing, health, food production/processing, creative and professional services sectors – including research and development in all these areas. • The Borough should encourage more sites for start-ups and growing businesses and consider developing these itself as a long-term investment.

Response Reference	Full name of respondent	Comments
57	Pegasus Group on behalf of Richborough Estates, Gnosall	Richborough Estates submits that identifying additional employment land to be delivered during the plan period is vital for supporting economic growth within the Borough, as well as to support the identified housing need arising both from within the Borough and from within neighbouring authorities. The Local Authority should utilise its evidence based to ascertain the amount and type of employment land required throughout the plan period.
58	Pegasus Group on behalf of Richborough Estates, Weston	Richborough Estates submits that identifying additional employment land to be delivered during the plan period is vital for supporting economic growth within the Borough, as well as to support the identified housing need arising both from within the Borough and from within neighbouring authorities. The Local Authority should utilise its evidence based to ascertain the amount and type of employment land required throughout the plan period.
59	Pegasus Group on behalf of Richborough Estates, Stone	Richborough Estates submits that identifying additional employment land to be delivered during the plan period is vital for supporting economic growth within the Borough, as well as to support the identified housing need arising both from within the Borough and from within neighbouring authorities. The Local Authority should utilise its evidence based to ascertain the amount and type of employment land required throughout the plan period.
60	Pegasus Group on behalf of Lovell Partnerships	Lovell Partnerships submits that identifying additional employment land to be delivered during the plan period is vital for supporting economic growth within the Borough, as well as to support the identified housing need arising both from within the Borough and from within neighbouring authorities. The Local Authority should utilise its evidence based to ascertain the amount and type of employment land required throughout the plan period.
62	Knights on behalf of Jonathan Lloyd Developments Ltd	Yes, particularly within the rural area where it is necessary for new sites to be provided that can provide new and improved facilities including to meet modern business requirements in accordance with paragraphs 11 and 83 of the Framework. The potential of our client's land at Hixon Airfield to provide additional employment development alongside the existing Hixon Airfield Industrial Estate RIE - perhaps in the form of a science, technology and commerce park that would deliver jobs of an alternative nature to those available within the existing local RIEs - has been outlined elsewhere in these representations and within our January 2018 Call for Sites submissions.
67	Hopton and Coton Parish Council	We need to look at what employment we have in the borough and what types of employment the borough needs. When this decision has been made, SBC can start looking for suitable land.

Question 12: What do you think are the key challenges facing the Borough's town, village, and neighbourhood centres and how can the Local Plan maintain and enhance their role?

Response Reference	Full name of respondent	Comments
3	Bramall, S.	The current neighbourhood plan hoards all development into the KSVs and is putting massive pressure on services and parking which have not kept pace – what is happening to the CIL contributions from these big developments? Meanwhile rural villages are being starved of new housing and 'empty-nesters' are forced to stay put and 'bed-block' if they do not wish to move into a retirement village. The lack of supply for the aging population in the rural areas is pushing up prices and will have a knock on effect on the care sector in time. Equality and diversity is a key issue – but does not seem to be addressed in the Scoping document.
4	Historic England	The significance of all heritage assets, including any contribution made by their setting, merits careful consideration in line with the NPPF and statutory duties. With particular regard to any expansion of Stafford, we would raise at this early stage the particular sensitivity of the setting of heritage assets, including but not exclusive to the setting of Stafford Castle and Bury Ring Hillfort.
12	Theatres Trust	As reflected in our comments above, it will be important that the Plan affords flexibility for non-retail uses to come forward that will help minimise vacancies and improve the overall mix of uses within the town centres.
23	Eccleshall Parish Council	Key challenges include: - High rents - Changes in shopping patterns - Lack of car parking
37	Knights on behalf of Birch House Lane Industrial Estate	The need to provide housing and employment development where it is appropriate in order to meet the aspirations of the wider Borough and to compete with adjacent local authority areas (in order to avoid outward migration). Maintaining viability and a range of services within town, village and neighbourhood centres is a key challenge in these times where the likes of online facilities (shopping, etc.) have adversely affected vitality and vibrancy of such centres. Amending the Local Plan to facilitate sustainable growth across the Borough (including in the rural area (including in and at appropriate sites near to villages of all sizes) would help to maintain and enhance the important role of town, village and neighbourhood centres.
39	Savills on behalf of Eccleshall landowners	A key challenge facing these centres is the capacity and provision of suitable community and public services. The viability of such uses is increased through the provision of development to increase the number of residents and therefore the viability of providing such services in these areas. Provision of new and upgraded community facilities will be enhanced where sites with sufficient critical mass can provide support for the delivery of new facilities (e.g. Doctor's Surgeries).
44	Colwich Parish Council	For Stafford town centre, it should be necessary to support development at the north end of the town. Efforts should be made to encourage short term pop up businesses in empty units. A better parking policy is required, which does not penalise businesses and customers. The Local Plan should encourage individual businesses and shops, so that there will be a more individual type of shopping experience and not just the usual national chains.

Response Reference	Full name of respondent	Comments
46	Stephen Locke Associates on behalf of landowners	<p>Some of the major challenges facing the area relate to the declining town centres and efforts need to be made to turn around the economic fortunes of the area. Small market towns such as Stone face unprecedented challenges and innovative approaches are required to ensure regeneration and survival in the face of out-of-town developments and the increase in online retail.</p> <p>Although community led solutions have a strong part to play, it should not be left to the community alone to address the challenges. While the health of the high street in towns such as Stone is a very visible issue, it must also be understood that their economic and social wellbeing is dependent on wider issues such as employment, development, housing, training and transport. It is imperative that new markets and businesses are attracted to the area to underpin the economy and vibrancy of the town centre.</p> <p>The need to identify innovative ways to provide public services and to encourage an agenda for change. Facilities and services should be maintained, developed and modernised in a way that is sustainable and retained for the benefit of the community. The further provision of jobs and homes in the Borough would support the provision of existing public services in the area and also potentially allow for the development of new public services.</p>
50	Staffordshire Wildlife Trust (SWT)	<p>In terms of green infrastructure and wildlife: Many urban areas have poor quality watercourses, scattered green spaces, and under-managed designated wildlife sites. Unimaginative development, especially in business parks and retail areas, has damaged the character of towns, and made them less interesting and unique. Natural areas and watercourses should be enhanced in terms of quality and access, as part of each settlement's identity and character, with better green routes and open spaces within town centres.</p>
51	Wardell Armstrong on behalf of Barratt Homes and David Wilson Homes Mercia	<p>The future policy should recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites (NPPF para 85).</p> <p>Para 7.21 of the SHELAA methodology consultation confirmed that sites which may be considered 'unsuitable' under the existing planning policy regime will now be assessed where they are adjacent to an existing settlement as this may allow the reasonable expansion of settlements in a sustainable manner and for wider benefits to the vitality and viability of the town centre to be enhanced through an increased catchment area / population close to shops, services, leisure and community facilities.</p> <p>Serious consideration should be given to sites adjacent to Stone which are considered as 'unsuitable' under the current policy documentation as they offer opportunities for reasonable expansion of the town in a sustainable manner that in addition to supporting future economic growth will present wider benefits to the vitality and viability of Stone town centre.</p>
53	Wardell Armstrong on behalf of Dean Lewis Estates	<p>The vitality and viability of rural village centres rely on the key services and facilities within them. A new local centre at Cold Meece will play an integral role in sustaining community life and in shaping people's perceptions of the area now and for future generations.</p> <p>The mixed-use regeneration proposals for Cold Meece at SLAA site: Ref ID 63 will create an attractive, vibrant and prosperous rural village centre that will play an important supporting role helping to sustain the growth and investment in the wider employment corridor.</p> <p>The policy for growth at Cold Meece should recognise this potential and should encourage a comprehensively master planned approach to the Cold Meece site SLAA Ref: ID 63.</p> <p>As part of the New Local Plan, the policy approach should ensure provision of a new small-scale village centre providing local convenience retailing and community facilities at a scale commensurate with the size of the expanded settlement.</p> <p>The New Local Plan should also advocate a policy approach which ensures appropriate provision of a new informal recreation and leisure opportunities in addition to the existing excellent provision of formal sports facilities present within this part of the borough.</p> <p>The scheme at Cold Meece will provide an integrated green landscape infrastructure that will incorporate a network of recreational tracks and trails within the scheme that will promote walking, cycling and jogging as a leisure pursuit for the well-being of the community.</p>
54	Lefroy, J. MP	<p>Key challenges include</p> <p>a) The erosion of local services as (eg) banks consolidate their activities.</p> <p>b) Less access to public transport as bus services are removed or cut.</p> <p>The Local Plan should identify which of these services are important for community life and ensure that they are made a priority.</p>
61	Savills on behalf of Lord Stafford Estates	<p>A key challenge facing the Borough's town, village and neighbourhood centres is the capacity and provision of suitable community and public services. The viability of such uses is increased through the provision of residential development, which increases the number of residents who support existing and new facilities. Provision of new and upgraded community facilities will be enhanced where sites with sufficient critical mass can provide support for the delivery of new facilities. Sustainable housing growth in smaller villages also provides the opportunity to support such settlements to grow and thrive. This is recognised and promoted in the revised NPPF (paragraph 78) and the Local Plan should be prepared accordingly.</p>
62	Knights on behalf of Jonathan Lloyd Developments Ltd	<p>The need to provide housing and employment development where it is appropriate in order to meet the aspirations of the wider Borough and to compete with adjacent local authority areas (in order to avoid outward migration and resulting reduced demand for/use of local centres).</p> <p>Maintaining viability and a range of services within town, village and neighbourhood centres is a key challenge in these times where the likes of online facilities (shopping, etc.) have adversely affected vitality and vibrancy of such centres. Drafting the new Local Plan to facilitate sustainable growth across the Borough, including in the rural area (including in and at appropriate sites near to villages of all sizes), would help to maintain and enhance the important role of town, village and neighbourhood centres.</p>

Response Reference	Full name of respondent	Comments
67	Hopton and Coton Parish Council	Hopton Parish Council would like to emphasise that originally SBC planned a route between Beaconside, the Cannock road and the motorway – this never came to fruition. Not enough resources are devoted to the road network. Only new housing seems to be a priority. Stafford's role could be enhanced by reducing parking fees and the business tax. If SBC were to do this, more people would visit the town and set up businesses there. In that way, more money would be coming into the town.

Question 13: What improvements would you like to see in those centres that you visit regularly? Should additional uses be supported other than retail such as residential, entertainment and restaurants? Please state the name of the centre in your response.

Response Reference	Full name of respondent	Comments
3	Bramall, S.	Eccleshall needs more parking, Slindon needs more housing.
23	Eccleshall Parish Council	Stafford would benefit from park and ride facilities, free car parking/larger car parks. Eccleshall – any new residential developments should contribute to parking in the town.
36	Ingestre with Tixall Parish Council	There is a need for cultural development using existing at risk buildings, e.g. the Shire Hall and Carnegie Library and to restore support for the Manchester Camerata Concerts.
44	Colwich Parish Council	See answer to Question 12 above.
46	Stephen Locke Associates on behalf of landowners	Financial incentives could potentially enable businesses to succeed in Stone. Capitalising on its status as a Market Town, with its canal, history and heritage make it an attractive location for high quality residential development supporting first class business development, as well as providing for the needs of future generations, through the provision of retirement homes, and a vibrant local economy and community ethos. The long term aim for Stone should be to ensure the name is synonymous with quality, productivity, innovation and efficiency.
54	Lefroy, J. MP	I agree that additional uses should be supported, including community events. I have no specific recommendations.
62	Knights on behalf of Jonathan Lloyd Developments Ltd	As set out in response to earlier questions and within our January 2018 Call for Sites submissions, our client's land at Hixon Airfield has the strong potential to deliver material improvements to the number, range and quality of local services/facilities in Hixon by way of the provision of a new local/village centre to serve both the proposed additional housing and economic development within the site and the existing local community. Such a new centre could deliver community facilities including some or all of a school, shops, medical and religious facilities.
67	Hopton and Coton Parish Council	Stafford. Some areas are now looking quite dilapidated. There should be an entertainment "hub" with restaurants, a cinema and a theatre. No-one goes into Stafford for entertainment at the moment. Parking fees could be changed – for example, there could be free parking after 4.00 / 6.00 p.m. and there should be free parking around the Guildhall.

Question 14: What are the best locations for new retail and leisure development in the Borough and how can future development be harnessed to support the delivery of wider regeneration and economic growth needs and objectives?

Response Reference	Full name of respondent	Comments
3	Bramall, S.	Stafford town centre needs bringing back to life – what would Mary Portas advise? There are already too many out-of-town developments, so no more are needed. We need more provision for small independent shops – these are what make Shrewsbury and Chester and interesting shopping destination.
4	Historic England	The significance of all heritage assets, including any contribution made by their setting, merits careful consideration in line with the NPPF and statutory duties. With particular regard to any expansion of Stafford, we would raise at this early stage the particular sensitivity of the setting of heritage assets, including but not exclusive to the setting of Stafford Castle and Bury Ring Hillfort.
35	Highways England	New retail and leisure opportunities could be supported where there is good access to sustainable transport choices, including public transport nodes such as rail stations and bus stops. Where such nodes are not available, consideration should be given to whether S106 or CIL monies could be used to help fund enhanced services, to support these facilities.
44	Colwich Parish Council	Existing towns are the best place for this.
46	Stephen Locke Associates on behalf of landowners	The key challenge is to ensure that the existing town centres such as Stone are able to respond to rapid changes in the retail and leisure industries, allowing a suitable mix of uses (including housing) and reflecting its distinctive character. The overriding vision should be to attract more visitors, better brands and greater choice to the Borough. This will encourage existing residents to spend locally and attract more tourists into the area.

Response Reference	Full name of respondent	Comments
		Increasing employment opportunities in towns such as Stone and clustering in key high value activities such as software, technology, advanced manufacturing and creative and cultural activities will help to generate income locally which will filter down to improved leisure developments.
53	Wardell Armstrong on behalf of Dean Lewis Estates	A small-scale village centre at Cold Meece would provide one the best locations within the Borough to serve the existing and new resident community. The existing Cold Meece settlement and its hinterland provides plethora of employment, recreation and social facilities but lacks the necessary number of homes to support a small convenience retail. Establishing a new resident community at Cold Meece on SHLAA site ID 63 will enable Cold Meece to function as a cohesive, self-sustaining community, thereby meeting the overarching Local Plan aims and objectives of delivering sustainable development.
54	Lefroy, J. MP	Leisure and sports facilities can be sited at secondary schools and made available both to schools and the community (as for instance at Wolgarston School in Penkridge). Major retail development should be sited at existing locations rather than developing new sites (except for local retail outlets).
67	Hopton and Coton Parish Council	Do we need any more retail parks outside the town? We need the town centre to be refurbished. Get the Eastern by-pass sorted now and start planning for the Western by-pass.

Question 15: Is there a need for the development of retail, leisure and other town centres uses in locations outside the existing established retail centres, and if so, where?

Response Reference	Full name of respondent	Comments
3	Bramall, S.	NO – the borough needs to help those existing retailers who are struggling to survive.
4	Historic England	We would helpfully raise that careful consideration should be given for the development of large-scale town centre uses in locations outside existing established historic retail centres, as these can draw activity away from historic high streets. This can result in vacancy in historic centres, missed opportunities for public engagement and enjoyment, as well as often costly future regeneration schemes.
23	Eccleshall Parish Council	Eccleshall PC is in favour of regeneration within the town centre. Opportunities to expand leisure in Eccleshall should be considered, such as adding bowls/play area to existing tennis and cricket club to create a better overall complex.
37	Knights on behalf of Birch House Lane Industrial Estate	The provision of some offices in rural areas would support rural communities and the rural economy in accordance with paragraph 83 of the Framework.
43	Chartley Parish Council	Question 15 talks about 'other town centres' but the document as a whole suggests that little consideration has been given to places like Rugeley and Uttoxeter in spite of the statutory requirement to work across boundaries.
44	Colwich Parish Council	There is no need for further retail development outside of the existing centres.
46	Stephen Locke Associates on behalf of landowners	Ideally, need will be dictated by demand. There is already a very healthy pipeline of stock and continued additional permissions may push the market into a state of over-supply. We have seen out-of-town schemes continue to evolve and it is likely that we will see an increasingly diverse tenant mix in the future. Getting the right scheme in the right place at the right time is crucial. This being the case, it is imperative to maintain a degree of flexibility with regard to the development of retail and leisure sites in locations outside existing retail centres. Incentives such as free parking, park and ride, late night shopping and purpose-built leisure and shopping experiences can encourage people into the borough.
53	Wardell Armstrong on behalf of Dean Lewis Estates	A small-scale village centre at Cold Meece would provide one the best locations within the Borough to serve the existing and new resident community. The existing Cold Meece settlement and its hinterland provides plethora of employment, recreation and social facilities but lacks the necessary number of homes to support a small convenience retail. Establishing a new resident community at Cold Meece on SHLAA site ID 63 will enable Cold Meece to function as a cohesive, self-sustaining community, thereby meeting the overarching Local Plan aims and objectives of delivering sustainable development.
54	Lefroy, J. MP	See answer to Q14.
62	Knights on behalf of Jonathan Lloyd Developments Ltd	The provision of some offices in rural areas would support rural communities and the rural economy in accordance with paragraph 83 of the Framework. As outlined previously in the event that the proposed housing and economic development within our client's land at Hixon Airfield were to come forward it would create the need for - and can clearly accommodate - provision of a new local/village centre within the site.
67	Hopton and Coton Parish Council	There is no need for further retail development outside established retail centres which should be refurbished.

Question 16: What new sport and leisure facilities do you think are needed in the Borough to support existing and new communities?

Response Reference	Full name of respondent	Comments
3	Bramall, S.	A swimming pool in Eccleshall would be nice.
13	Sport England	3.36 and Q16 – Note that the NPPF states planning policies should be based on robust and up to date assessments of the need for open space, sport and recreation facilities and opportunity for new provision. The production of a playing pitch, built and indoor strategy will inform what the current and future demands are for sport and leisure facilities. It should be noted that demand for sport and leisure facilities do not necessarily have to be new facilities and instead could be met for example by refurbishments of existing facilities and pitch quality enhancements.
23	Eccleshall Parish Council	Eccleshall PC are in favour of informal open spaces for play which includes ball play areas Facilities of a more diverse nature should be considered, such a climbing walls, zip wires.
28	Banham, D.	Sporting and Leisure facilities need to be developed in line with the growing population to meet the increasing demand.
40	Woodland Trust	We would like to see creation of new woodland and planting of trees in a variety of other contexts (eg trees in streets or parks or in housing area) prioritised in your local plan, in recognition of the wide range of social, economic and environmental benefits that trees and woods are able to provide; eg shading to keep areas cool in summer, alleviation of flooding, removal of air pollution, combatting climate change etc. It is particularly opportune to look for opportunities to plant trees and create new woods as part of new housing development, to encourage people to go out of their homes and get healthy exercise in the surrounding area. In your current local plan at para 11.23 of Part 1, you refer to the Woodland Trust's Access to Woodland Standard. This can be used to derive woodland creation targets and we would be happy to talk to your officers further about this. The Standard aspires that everyone should have a small woods of at least 2ha in size within 500 metres of their home and a larger wood of at least 20ha within 4km of their home. Very few councils achieve 100% compliance with these standards but some councils have set targets based on the Standard in their local plans or in other strategies. For further information please refer to https://www.woodlandtrust.org.uk/publications/search/?query=space+for+people
44	Colwich Parish Council	More tennis courts are required and they should be preferably hard court and floodlit. More Multi Use Games Areas are required in the Borough area also.
46	Stephen Locke Associates on behalf of landowners	We are not currently fully aware of all of the provision within the borough and therefore it is difficult to comment, however any new residential development will need appropriate public open space and recreation facilities. By providing footpath and cycle links to existing facilities, a holistic approach can be developed to further support those existing facilities, to increase the portfolio of leisure facilities within the Borough and to encourage people to be active.
48	GVA on behalf of St Philips	It is recognised that the Eccleshall Parish Neighbourhood Development Plan establishes five aspirations to be delivered through future development proposals, including: <ul style="list-style-type: none"> • Road infrastructure around the town or an alternative route for heavy goods vehicles; • Improvements to parking facilities within the town; • 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. The Plan sets out that there is little open space in Eccleshall for a town of its size when compared to smaller surrounding villages which have publically maintained open space, supporting the provision of parkland and play facilities. In order to help overcome this deficit, a Country Park to provide a walk along the bank of the River Sow is suggested as an aspiration to facilitate existing demand. In response to these aspirations, the comprehensive Vision Document and masterplan for the land at Castle Street submitted alongside these representations and the SHLAA, has sought to retain a large proportion of the land within the boundary as a Country Park. Whilst this borders a tributary of the River Sow, it is considered that a link could be provided to enable the space to connect to the permissive Eccleshall Walk 8 route and subsequently provide riverside public access. In addition, an area of formal play will be located within this area of open space, together with informal play opportunities. The proposals would therefore accord fully with the aspirations of the Neighbourhood Development Plan whilst also seeking to improve accessibility and enhance the provision of open space and leisure facilities within the Borough, whilst supporting leisure facilities to meet the needs of the emerging Local Plan.
49	Staffordshire County Council	Landscape Recreational pressure on Cannock Chase AONB is increasing as a result of housing development, which puts the key sensitive habitats that are integral to the designated landscape of the AONB at risk of detrimental impacts. There could be opportunities to address increasing user pressure through developer contributions and/or CIL directed to Green Infrastructure, to support new parks, woodlands and open space that provide for recreational use away from sensitive areas and potentially outside the AONB. This objective could be supported by strengthening and cross-referencing policy relating to landscape character with policies for wildlife and cultural heritage.
53	Wardell Armstrong on behalf of Dean Lewis Estates	Within close proximity to Cold Meece and directly adjacent to Baden Hall, lies the home of Eccleshall RUFC and its clubhouse. The Eccleshall Football Academy site is adjacent to the entrance to Baden Hall. Within the grounds of Baden Hall there is a range of nationally recognised recreational Fishing Lakes. These facilities offer significant community facilities directly adjacent to the built settlement of Cold Meece. The development of Cold Meece will supplement further this existing impressive formal recreation offer with more informal provision that will take advantage of the major landscape structure within the 85-acre site providing routes for cycle tracks, jogging trails and footpaths.

Response Reference	Full name of respondent	Comments
		The development delivery policy for Cold Meece should include criteria to ensure the integration of the residential area with the provision of informal open space of the type described here.
54	Lefroy, J. MP	See answer to Q14. Stafford requires at least one more swimming pool which is open to the public. This could be sited at a secondary school. Stafford could also consider working with national sports bodies to build a 50m pool (perhaps at/near the County Showground) with the aim of attracting national and international meets.
66	Natural England	This question potentially touches on the role of green and blue infrastructure as multi-functional networks of green and blue space including open spaces for sport and leisure. The NPPF emphasises the strategic role and importance of green and blue infrastructure and we anticipate working with the Council to explore options to deliver an effective green and blue infrastructure resource for the borough accordingly.
67	Hopton and Coton Parish Council	Sport centres don't pay.

Question 17: National policy gives councils new powers to protect valued open spaces by designating them as Local Green Spaces. Are there any open spaces that are special to your local community which should be designated? If yes, please provide details of the open space, its location and the reason why it is special to you and your community.

Response Reference	Full name of respondent	Comments
3	Bramall, S.	The recent developments seem to include very little green space in terms of gardens and landscaping. Can planning policy include a minimum area/ % of landscaping. Attractive and affluent towns are often described as "leafy" and are attractive to tourists as well as residents.
6	Sammons, S. and P.	Local Green Space – off Falmouth Avenue Thank you for making us aware that you have submitted an application to Stafford Borough Council for the land off Falmouth Avenue to be designated as Local Green Space. As a regular user of this piece of land we wholeheartedly support this application. To us it is a "little gem" in an oasis of housing estates particularly as more and more of Stafford appears to be being turned into more housing. I have no doubt that the Borough council will try and state that we live on the doorstep of Cannock Chase which has AONB status BUT it is not accessible to everyone. In our very busy life we do not find it a sensible use of our time to drive to the Chase whereas it is so much more sensible for our health to walk our dogs from our home so we choose to walk along the canal nearby which is lovely for us but fails to satisfy our second dog Woody who is a natural ball chaser and we cannot throw balls along by the canal for obvious reasons as the path is not wide enough nor suitable for this. We love to walk both of our dogs along the canal and then up onto "Rabbit Hills" as this land is affectionately known by all of the locals. Here we can experience the sheer joy of watching our beloved Woody chase his ball until he is tired, our other dog then gets left alone by his sibling to allow him some "quiet" time just being a dog without being annoyed by his younger sibling. We get such joy just watching them enjoy being dogs, off lead and able to venture off the path in the undergrowth following whatever smell they pick up. We cover several circuits of the site and this includes walking up and down the steep hillsides which ensures that we get some excellent aerobic exercise ourselves whilst walking our much happier dogs. There is always something to see from this site whether it's other dogs which is positive dog socialisation (when our dogs were young puppies we deliberately visited the site as much as we could to socialise them and they are now so good with other dogs. We see children cycling and making up cycle jumps, we see people using it for exercise purposes, we love to see children playing hide and seek and it is clear from the people that you pass when walking there that not everyone walks a dog some clearly walk just to enjoy the open space which is good for their mental health. We have walked home having identified something on a tree or bush and tried to find out what it is such as the Oak Gall Wasp, different butterflies, moths, birds and plants. We see people of all ages from the young to the very elderly and we have often thought wouldn't it be nice to have seating around the site for the older generation to come along and just sit and observe life and perhaps even socialise. We have been told of previous plans for housing on this site and would do our utmost to campaign against it. Modern housing estates now don't have much garden, so dogs don't get to behave like dogs by running and chasing things so for both our health and our dog's health please don't allow this beautiful open space to be changed and we must endeavour to keep it as open green space for generations to come as not everyone can drive to Areas of Outstanding Natural Beauty.
7	Bodger, A.	Local Green Space - off Falmouth Avenue I'm writing in support of the above local green space as this area is incredibly important to me and my family. It offers a wonderful escape on our doorstep from the busy world we live in. I use it to clear my head and blow the cobwebs away after a stressful day at work and at the weekend for some peace and quiet. I've lived locally for 17 years and have brought my children up here and as youngsters they also enjoyed the area too. It would be devastating to our community to ever lose this area to an already over development world.
8	Miller, D.	CURRENT USERS OF THE LAND OFF FALMOUTH AVENUE 1. I have been using the local green space for 8 year(s)

Response Reference	Full name of respondent	Comments
		<p>2. I use the local green space 7 times per week</p> <p>3. use the local green space for walking my dog</p>
9	Sharkey, J.	<p>Local Green Space- off Falmouth Avenue</p> <p>I am more than a little concerned that the Council requires evidence that the Green Space off Falmouth Avenue is of particular significance to the local community when really one only has to walk on it to take in the fact that this area is probably the only green space in Stafford that has hills and valleys available to the public, and especially the youngsters, to enjoy.</p> <p>Whilst I am one of the more senior members of the public and can no longer gambol and frolick in the unique landscape of this piece of land I have four grandchildren and every year over the last ten years they have all , together with their friends made this land their base for many activities. At present my youngest tells me she is there at least two to three times a week with her friends. During the recent very hot weather they have fully enjoyed the benefit of their group being able to sit in the shade provided by the trees.</p> <p>Apart from the youngsters there are always people with or without dogs making full use of this unique facility.</p> <p>It, surely must be a prime consideration of the Council, with the huge amount of housing development taking place in the Baswich/Weeping Cross area to have some space for residents to enjoy the freedom of open natural areas and Falmouth Avenue is the ideal area for leisuretime.</p> <p>Quite frankly I am astounded that any plans for development on this land can even be considered and would be extremely annoyed, and disappointed, if the Council did not continue to keep Falmouth Avenue in its present state.</p>
10	Haslam, D.	<p>Local Green Space - Off Falmouth Ave</p> <p>My family and I moved to this address in 1983. At that time, in addition to this green space, we had a public open space to the rear of Falmouth Ave (even numbers) which could be accessed by all via a path between numbers 24 and 26.</p> <p>This land was subsequently subdivided and sold off to the adjoining residents – precious few gained but the local public lost out. Since then the only local facility available for health and wellbeing is the green space opposite Falmouth Ave (odd numbers).</p> <p>My wife and I enjoy walking and use this land twice or three times a week. When the family comes to stay this frequency increases as it is a safe area for the grandchildren to run free. They use it for bird and train spotting as well as fruit picking.</p> <p>As there is no nearby alternative we would view it as a loss of amenity, convenience and wellbeing – not forgetting the loss of local flora and fauna.</p>
11	Harwood, L.	<p>Local green space off Falmouth Avenue</p> <p>I am writing to let you know of my usage of the local green space off of Falmouth Avenue.</p> <p>I have been a resident on Torrington Avenue for 19 years and regularly use the green space for a variety of reasons. I am a keen birdwatcher and wildlife enthusiast and enjoy the opportunity to see the wildlife on my frequent walks. As a PE teacher, I also use this area for fitness purposes, running several times per week. The area is of extreme value to my personal physical and mental health.</p> <p>In summer, I fruit pick and in winter our family enjoy sledging using this area.</p>
15	Curtis, C.	<p>Local Green Space off Falmouth Avenue</p> <p>I write in support of the application to SBC for the land off Falmouth Avenue to be designated as local green space.</p> <p>I have lived in Stafford for fifty years, at Rickerscote, Western Downs, the area adjacent to the RAF camp and also now in Baswich.</p> <p>I have lived adjacent to the area of land off Falmouth Avenue for the last seventeen years at the address of [redacted] and it is literally unique for the residents of this area and should be designated a green space.</p> <p>During those years I have raised my children and socialised / looked after their friends and used the area in question almost daily, when the weather permits. (Even in poorer weather we have been able to socialise with numerous residents and their children particularly during snowy weather when many local people use the slopes for safe sledging and watching over their children.)</p> <p>The area is unique in providing a recreational area to walk and observe wildlife in addition to providing a pathway to the local canal and opening up literally miles of canal towpath from there to Shugborough and in the opposite direction to Wolverhampton.</p> <p>I have along with friends who live on this estate been able to quite simply sit in the sun watching our children play the way we are able to do years ago when going into fields and being in the presence of wildlife were daily occurrences. Now it isn't the same and the small green areas left in housing estates do not provide the type of experience and education that this unique piece of land enables. Over the years hundreds and thousands of local people have visited to watch the rabbits and wildlife taking a break from the pace of life to recreate and also educate our young children about nature.</p> <p>I would like to highlight a less considered aspect of the areas use. I am aware of people who have make jams from the blackberries which can be picked, sold them at local scouts and parish fairs and made money for charities in doing so - the cycle of education and selflessness for our young people to learn from is hardly recreated in any other area of Stafford with the exception of possibly picking up the disused railway line from Stafford Rugby Club and into Derrington. I notice that the Derrington local community have been able to secure their own magnificent area for their community presumably for all the same reasons that the area at the back of Falmouth Avenue should be preserved for this community.</p> <p>In addition the area off Falmouth has an incredible diversity of wildlife that includes bats, moths, extremely diverse amounts of birds and consequently why the eco system in the area supports huge numbers of rabbits, hedgehogs which search through gardens in the evenings, foxes, badgers and in extremely difficult weather deer also arrive which are fed by local residents. It is rare for such nature to be so close to urban areas and for the local population to be able to live in harmony</p>

Response Reference	Full name of respondent	Comments
		<p>with it. Undoubtedly the most significant legacy of this area of land is the education of all who use it, particularly children, in living with wildlife, respecting the need to recycle and conserve, respect for nature and to be a better balanced individual. In a world where creating real life experiences rather than computer generated visual technology the area is a unique part of this area of Stafford. I believe that SBC have a responsibility to develop the Borough but also to recognise when compromise is needed and original ways of life preserved. The use of this land has always been for the local community and they in turn have used it respectfully and with a love for what it offers in return.</p> <p>Therefore, I wish to register my support for this extremely valuable and unique area of Stafford to be preserved for the future Staffordians who will live in this area so that their lives can be enriched in the same way that so many others have been in the past.</p>
16	Ramakrishnan, S.	<p>CURRENT USERS OF THE LAND OFF FALMOUTH AVENUE</p> <ol style="list-style-type: none"> 1. I have been using the local green space for 5 year(s) 2. I use the local green space 2 times per day 3. use the local green space for dog walking, fitness, fruit picking.
17	Nottingham, P. and P.	<p>CURRENT USERS OF THE LAND OFF FALMOUTH AVENUE</p> <p>We are submitting this email as a statement of our use of that land and its pleasures that it provides.</p> <p>We are one of the privileged people who own a property overlooking the land, we can witness all the activities that this small area of established wild country side between the road and the railway that has given myself and all the other users who pass my house the joy of using it.</p> <p>My Reasons for wanting this to stay as the small area of established wild country side are as follows.</p> <ol style="list-style-type: none"> 1. The natural beauty that it projects from the sights, sounds and smells that change all year around on a daily basics. 2. The wild life that uses the established wild country side and feed off it such as the birds including migrating birds, rabbits, foxes, badgers, hedgehogs, deer's and Bats at certain times of the year during darkness. 3. The reason I purchased my house many years ago was for the direct access to this land so that my children could play on it as they where friends of the families that rented the horses fields from the council. 4. Since the council stopped renting the land it has not been managed but allowed to grow into an established area used by all, the residents have created maintained footpaths for access such as walking dogs direct access for school children going to and from school, people going on longer walks via the canal, these paths could now be seen as unofficial local public rights of way footpaths. 5. We use the small area of established wild country side as recreational area to enjoy the walk in the country side as it gives a different dimension to the housing estate to relax in with out using a car to travel too, our children have had many hours of fun playing on that land from exploring to winter sports giving them the education of life in a safe environment without travel. I feel all estates should have an common communal area like this. 6. I wish to share an experience with you, recently my son and grandchildren came from Gloucester and stopped with us, what did the want to do first? go and play in the small area of established wild country side as it one of the things they remember as the bygone fun times in Stafford. <p>To Summarise I feel that any housing on this land would be detrimental to this community we would lose all the above and dog walkers may resort to letting dogs run / foal on football pitches / playing fields etc, children may start to hang around the shops as their chill out areas. I would like the council to support its community and give this area official common ground status.</p>
19	Wilson, J.	<p>Falmouth Avenue</p> <p>I have been using this green space for the last 18 years. I use this green space three times a day where I walk my dogs and walk the children looking at the wildlife such as birds and rabbits.</p> <p>I keep active by running on this local green space which helps my wellbeing.</p> <p>Please don't take this away from our community.</p>
20	Armour, A.-M.	<p>I am writing to express my support for the application for Rabbit Hills (land off Falmouth Avenue) to be designated as Local Green Space.</p> <p>We use it for walking, for recreation and also for exercise. Open areas like Rabbit Hills encourage people to get outdoors – they are less likely to do it in an overcrowded urban environment, as opposed to a restful green space. Rabbit Hills provides a peaceful non-built-up area and room for larger trees which small modern gardens cannot accommodate.</p> <p>Rabbit Hills is also important for children as a place to play. It stops other areas from getting overcrowded and gives teenagers somewhere to go, which makes anti social behaviour in other open spaces less likely.</p> <p>Our four children go there at least once a day. They run, make noise, climb trees, build dens and explore. This is also important to other people in the area who don't have to put up with them doing those things within earshot.</p> <p>This is an area that the local community can access easily, rather than having to jump into a car and drive down to the Chase. Its existence encourages outdoor activity as an everyday thing rather than something you have to plan for, thus making it more likely to happen. It is a relatively small area but is of great importance to the local community.</p> <p>Rabbit Hills also provides a home for wild life, necessary as modern gardens are increasingly small with no space for wild life. It is of historical importance, being previously known as Stockton Common, as described by Laura Hesselbee in her book 'Down By Jacob's Ladder'.</p> <p>Please consider favourably the application for this land to be designated as Local Green Space.</p>

Response Reference	Full name of respondent	Comments
22	Dunn, D.	<p>I am writing to you in connection with the debate regarding the local green space off Falmouth Avenue, specifically with regard to the value of the said space in the life of the local community.</p> <p>I have lived in the vicinity of Falmouth Avenue since 1973 and, from the outset, used the space as a means to access the canal and in recent years as a community open space. When the space was used as a paddock, there was still access and much was made of it. When the old railway-gang access path (with the remains of an old railway building adjacent to the tracks) was blocked, access was provided by a footpath- and that in itself is well-used.</p> <p>With regard to the fields, known locally as the 'Rabbit Hills' (a name that emerged through constant use) the value of the space for the local community is enormous. In the course of decades I have accessed it in the early mornings (with dogs), in the daytime - weekdays and weekends - and early evenings. Very seldom have I been there on my own, encountering others making use of the space. Over time - years! - we have come to know faces (and dogs!), if not always names. Indeed, the nature of the space is clear when anyone crosses it - for there are regular routes that are clear to see for anyone who cares to look. Apart from anything else, it acts as a space of encounter.</p> <p>In time the adjacent areas have been built on, with the spur out from Falmouth Avenue and - more extensively - houses spreading from Baswich Lane onto the once open land. Indeed, it should come as no surprise that over the years - as we have walked the area - there has been speculation that we ought to use the land while we may, given what looks (for those with another vision) like a neat opportunity to link the areas of expansion with a 'simple infill' to complete a ring of housing. Perhaps there is an assumption that the Falmouth Avenue area would be a mere 'infill' or completion project.</p> <p>Were that to take place, in my view, a most valuable asset to the community would be lost, never to be recovered. It can hardly be described as a place of quiet contemplation, given the adjacent railway, but it is a valued space nevertheless. It is a place 'to be', a place to meet, a place to play, a place to take exercise (perhaps, for some, their only opportunity) and valuable for all that. It is a de facto nature reserve on our doorstep, without such status, but valued as such. It is a place for birds - and rabbits - and it is a space that affords views across relatively open country - the sewage works notwithstanding.</p> <p>It is our local green space and I hope that it will be registered as a Local Green Space - warranting additional protection. It is here, where we live and it is manifestly an asset for our community. I hope that it will continue to be regarded - formally - as such for decades to come. I would like others to experience the space as I have.</p>
23	Eccleshall Parish Council	Eccleshall PC are in favour of protecting local green spaces and have already made provision for this within the Parish.
24	Jewell, H.	<p>I am writing in support of the application to register the common land off Falmouth Avenue in Baswich, as local green space.</p> <p>I moved into this area, from the north of Stafford, almost 2 years ago and the main reason for choosing this house was the common land. To have nature so close and the beautiful views and sounds, is idyllic. Having moved here from living on a busy main road, Stone Road, I realise how much it affects health and well-being. I used to take inhalers and have asthma and hayfever. I now have no symptoms or medication and I am sure the lack of traffic and fresh country air from the common land has contributed to this.</p> <p>A few days every week, I work from home, in a room with views towards the land. At all times of the day, almost every time I look over to the fields, there is someone there, whether it be joggers, dog-walkers, children playing, cyclists, families pushing prams or just people going for a walk. It is a very sociable area, for example there is the daily 10.30 meet up of dog-walkers by the big tree. It is rare to see no one there. If the fields were gone, it would affect a great many people.</p> <p>We as a family use the land very regularly, at least a couple of times a week, to cycle or walk. It can be just a flat easy walk or taking the very steep hills, it is very good fitness training. Also it is easy access to the canal towpaths for a longer walk or run.</p> <p>There is so much nature there too, so many varieties of birds and, early in the morning or dusk, you can see the rabbits.</p> <p>We love it as an easily-accessible area of peace and tranquillity and countryside in a busy town of traffic and noise and people. Please register this as local green space</p>
25	Rafferty, S.	<p>I would like to request that the green space off Falmouth Avenue, Stafford is preserved as such for the continued use of local residents and the wider community alike</p> <p>This is an area where people can walk themselves, their dogs, children can play and you can sit to observe birds and wildlife or just enjoy the peace and quiet away from traffic and other noise pollutants</p> <p>This is an area where my children played with friends and now take my grandchildren to play, walk the dog and went sledging in winter</p> <p>Please say NO to building on this land so that we can all continue to enjoy its beauty</p>
26	Rafferty, K. and Johnson, M.	<p>SUPPORT OF PROTECTED GREEN SPACE – LAND OFF FALMOUTH AVENUE</p> <p>We would like to re-register our support for the request for the land off Falmouth Avenue to be designated as Local Green Space since our last letter in 2015.</p> <p>This green space is close to the community it serves and is used several times a day by many local people for dog walking, exercising, play, sledging, family picnics and often as space to get some relaxation time after the strains of the day. The area is such a beautiful place and should be recognised as such. It is important that such key space is kept to maintain areas where families can exercise, learn and relax together – away from televisions, radios, internet, pollution from traffic and noise - enjoying some quality, uninterrupted time together without having to get in the car (which is often needed when visiting Cannock Chase).</p> <p>The area is also rich in wildlife and fruit-growing trees and bushes – often the children get to watch birds and rabbits in their natural environment and learn about them in situ.</p> <p>One of us has lived locally for 35 years and the other for 10 years – however, we have both been using the land for much of our lives when growing up, playing as</p>

Response Reference	Full name of respondent	Comments
		children with friends – and now enjoying it as outlined above with family, friends and pets. The land off Falmouth Avenue is so important to us that it became essential criteria to remain living locally to it for our recent house search.
27	Reeves, J.	<p>I am emailing in support of the Falmouth Action Group who have applied for the green space off Falmouth Avenue to be registered as Local Green Space. I walk my dog on this area of land once or twice every day and also use it when walking or cycling into town, onto Cannock Chase or to get anywhere else in the surrounding area. Many others use it for the same reasons and it is highly unusual to be on 'the fields' and not see anybody else.</p> <p>I have made several friends who I've met whilst walking my dog on the fields, which has led to us going to social events together, looking after or walking each others dogs as a favour or has just given us an opportunity to meet up, walk and chat and 'put the world to right'. Without this meeting area, morning walkies would not be as much fun for me and my dog, and I know we would both really miss meeting and socialising with fellow dog owners and their dogs.</p> <p>I hope the council sees sense and takes into account the wishes of the local population who just want a small area in which to exercise, dog walk, take in the fresh air in a quiet rural(ish) setting, socialise and enjoy.</p>
33	Thompson, H.	<p>Please find below a copy of form declaring my usage of Baswich Common/ land off Falmouth Avenue.</p> <ul style="list-style-type: none"> • I struggled to get to know people in the area when I moved here but it is only through using the common to walk the dog that I first got to chat to people in the community. It is a sociable place and it has to be beneficial for keeping crime down if you know people in your community. • It's great for well being and tackling loneliness. It's uplifting to walk across the common. It's an incredibly beautiful space. We are so lucky to have it as part of our community. It is a very special and unique place. • I teach forest skills to children with disabilities and regular walking on the Common keeps me in touch with what is happening in the seasons in the natural world. Eg the blossom and catkins on the trees, the pollination by bees and seeds/ fruit. Which tree species are turning and dropping leaves first. I could go on and on and on. It gives me lots of ideas for my forest school activities! • There are a lot of rabbits on the Common and I heard an article on radio 4 talking about how numbers of rabbits have declined recently by something like 90% and they wanted people to report sightings in their local area. (I think it must have been some sort of rabbit protection/ wildlife organisation but I'm sorry I can't remember the name) If rabbits are so endangered then ' bunny hills' could be a very important site to help with their conservation. • My own three young children have bags of energy and love nature. They just adore running around on the common picking blackberries, identifying trees, and playing in dirt! Not to mention sledging and playing in the snow! The Common is STUNNINGLY BEAUTIFUL in the snow!! Bliss!! It really is good for the soul going on the common!!!
34	Ashfield, L. and Faulkner, A.	<p>Protected Green Space – land off Falmouth Avenue</p> <p>We are writing regarding the land off Falmouth Avenue which is bordered by Saxonfields and Falmouth Avenue/Falmouth Close and the railway line. This land is directly opposite our house and we would urge you to designate this land as Local Green Space in accordance with Policy SB3.</p> <p>This particular piece of land is unique to the area and is not an extensive piece of land. It is hilly, fertile and very scenic. It is part of the Weeping Cross estate in Baswich and is used extensively by residents of Baswich for recreation. It has a diverse wildlife with the terrain being home to numerous rabbits and other mammals as well as many different birds. There are also many wild flowers growing there.</p> <p>We often walk over the fields for both exercise and recreation. We work from home so often take short walks over the area to clear our heads and to get some fresh air away from the roads. Having this area on our doorstep is a wonderful boon.</p> <p>We are clearly not the only people that think so because it is extensively used by other members of the local community. Although the main use is for walking (there are not many times when you cannot find somebody walking their dogs over there), it is also a safe environment for the local children to play on. Many other activities also take place on these fields, e.g. bird watching, blackberry picking and, as soon as there is the slightest fall of snow, children go out on their sledges. We feel that this land meets the criteria necessary to be designated as Local Green Space and we hope that you will include it as such in the Borough Plan.</p>
44	Colwich Parish Council	Colwich Parish already has two local green spaces designated in its Neighbourhood Plan and these should be respected in any future Local Plan. We would like the area bounded by the West Coast railway line, the Trent and Mersey canal and Mill Lane to be additionally designated as a Local Green Space. This area is valued by local residents for its biodiversity.
54	Lefroy, J. MP	I believe the green area off Falmouth Avenue in Baswich should be protected as a community open space as I have already advocated.
63	Cllrs Farrington and Edgeller	<p>We fully support the Falmouth Action Group in their endeavours to keep the Green Space on Falmouth Avenue and having it designated as a Local Green Space to help with the Health & wellbeing of the Community in the area of Baswich.</p> <p>We would wish to refer to the representation we made previously supporting this matter.</p>
64	Bailey, J. and T. on behalf of Falmouth Action Group	<p>In response to the latest local planning consultation, you are already in possession of the detailed submission, written on the standard form, made earlier this year and it is still relevant. However the headcount / footfall figures, as stated in the document, are out of date.</p> <p>We have completed a large survey of the people who use the land and these user report details have been collated, analysed and are enclosed along with letters of support from residents [27 total]. Also the detailed bird Survey [see full response].</p> <p>We still wish that the land off Falmouth avenue be considered for Local Green Space status as part of the new local plan and look forward to receiving further consultation / information in the future.</p>

Response Reference	Full name of respondent	Comments
66	Natural England	Natural England's access to evidence publications catalogue is likely to provide references to help evidence the value of spaces suggested by those responding to this consultation. Themes such as 'use and enjoyment of the natural environment' may provide valuable information; http://publications.naturalengland.org.uk/category/61004
67	Hopton and Coton Parish Council	There should be no increase in the designated Green Spaces that Hopton already has.

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?

Response Reference	Full name of respondent	Comments
3	Bramall, S.	Have you asked U3A?
23	Eccleshall Parish Council	School growth needs to be considered proactively in line with potential housing developments, before approval of planning applications, to ensure junior provision remains local to home. It is unlikely the primary school in Eccleshall can expand to meet further demands, so this needs to be considered ahead of any future large developments.
28	Banham, D.	Educational facilities need to be developed in line with the growing population to meet the increasing demand. (For example the Kingston Centre on Fairway could be changed back into a school (possibly a super primary) to serve increasing population in the area.)
36	Ingestre with Tixall Parish Council	There is a need for more classes for adults and pensioners, e.g. in the town centre.
44	Colwich Parish Council	The area of Hopton needs new schools to support the new housing in the Borough. Another secondary school is required and more capacity is required for primary education.
46	Stephen Locke Associates on behalf of landowners	This submission aims to support the strategic expansion of Stone. Any major new development areas will require new educational facilities and the aim should be to enhance, strengthen and improve education facilities in the Stone Area to support the new development. This will ensure that people don't have to travel too far to access the services they need.
49	Staffordshire County Council	<p>Education</p> <p>There are currently 57 schools within Stafford Borough. Within Stone, which operates a three tier education system (First, Middle and High schools) there are 10 first schools, 1 catholic primary school, 2 middle schools and 1 high school. There are 3 primary schools which due to their location on the Stafford Borough boundary are identified for school place planning purposes as being within the "Blythe Bridge school place planning area" and operate within a two tier education system. Stafford has 6 secondary schools and 34 primary schools, operating with a two tier education system.</p> <p>Due to the impact of housing within the adopted Local Plan there are plans for three new primary schools two will be North of Stafford town, and one to the West of the town. In addition there will be a new secondary school in the North of the town. In Stone, both of the middle schools have recently increased capacity and the only high school is being expanded to meet demand from the housing already proposed, commenced or built.</p> <p>In Stafford, the location and number of dwellings proposed as part of a Local Plan up to 2040 would influence what additional capacity would be needed and whether this would take the form of expanding existing local schools or the provision of new schools. Any large scale development or the cumulative impact of a number of small to medium sized development sites in proximity to each other could require land for new schools to be provided, as an indication 1,000 dwellings equates to 1 form of entry (FE) of primary school places and 5,000 dwellings equates to a new 5 FE secondary school, which is considered the minimum size for a viable secondary school. The existing six Stafford secondary schools providing school places for the town and outlying areas of Stafford are located in or on the edge of Stafford town and any proposed development in villages and outlying areas of Stafford town would need to take into consideration the impact not just on the local primary schools but the wider impact on secondary schools.</p> <p>In Stone, the location and number of dwellings proposed as part of a Local Plan up to 2040 would influence what additional capacity would be needed and whether this would take the form of expanding existing local schools or the provision of new schools. As an indication 1,000 dwellings equates to 1FE of provision at first, middle and high. The two middle schools have already increased capacity, whilst the high school is currently being expanded to provide additional places. Any further development could require land for new schools to be provided for all three phases of education. Both the middle and the high schools are located within Stone Neighbourhood area. These schools provide middle and high school places for all of Stone, so any proposed development in villages and outlying areas would need to take into consideration the impact not just on first school provision but the impact across all phases of education.</p> <p>The North Staffordshire Urban Areas includes parts of Blythe Bridge, Trentham, Clayton and Meir Heath/Rough Close. There are three primary schools Fulford Primary, Meir Heath and Springcroft Primary which are in the administrative boundary for Stafford Borough which are covered by the Blythe Bridge school place planning area. Meir Heath and Fulford primary schools cannot be expanded further due to constraints of the school sites. There would be limited potential to increase capacity at Springcroft primary. For secondary school provision these primary schools fall within the catchment area of Blythe Bridge High, rather than Stafford Secondary schools. The Staffordshire Moorlands Local Plan Submission (February 2018) does not include any housing which would directly impact on these three schools. There are however two housing developments with planning permission which are within the wider Blythe Bridge school place planning area</p>

Response Reference	Full name of respondent	Comments
		<p>for which additional capacity is being provided.</p> <p>Large Settlement Villages</p> <ul style="list-style-type: none"> • Barlaston: There is some potential to expand the existing school dependant on the number of new homes proposed and education contributions may be sought. • Eccleshall: The existing school is being expanded to provide capacity from the current housing and there is no potential to expand further. A new primary school including land would need to be factored into any consideration for further growth. • Gnosall: The existing school has previously been expanded and there is no potential to expand further. A new primary school including land would need to be factored into any consideration for further growth. • Great Haywood: There is no potential to expand either of the two existing schools, both of which are land locked. A new primary school including land would need to be factored into any consideration for further growth. • Hixon: There is limited scope to expand the existing school dependant on the number of new homes proposed and education contributions may be sought. • Little Haywood/Colwich: There is a proposed expansion at the existing school. There is no scope to expand further. A new primary school including land would need to be factored into any consideration for further growth. • Yarnfield: The local primary school has already been expanded and there is no scope to expand further. A new primary school including land would need to be factored into any consideration for further growth. <p>Medium Settlement Villages</p> <ul style="list-style-type: none"> • Barlaston Park: There is no school within this village the catchment school for this area is in Barlaston. • Brocton: There is no school within this village the catchment school for this area is in Stafford. • Brocton A34: There is no school within this village the catchment school for this area is in Stafford. • Derrington: There is no school within this village the catchment school for this area is in Seighford. • Fulford: There is no potential to expand the school due to constraints of the site. A new primary school including land would need to be factored into any consideration for further growth. • Great Bridgeford: There is no school within this village the catchment school for this area is in Seighford. • Haughton: There is limited capacity to expand the existing school dependant on the number of new homes proposed and education contributions may be sought. • Tittensor: There is potential to expand the existing school dependant on the number of new homes proposed and education contributions may be sought. • Weston: There is no potential to expand the school, which is land locked. A new primary school including land would need to be factored into any consideration for further growth. • Woodseaves: There is potential to expand the existing school. Land for a new primary school and education contributions would need to be provided. <p>Small Settlement Villages</p> <ul style="list-style-type: none"> • Adbaston: There is no school within this village the catchment school for this area is in Eccleshall. • Bradley: There is no school within this village the catchment school for this area is in Haughton. • Church Eaton: There is limited capacity within the existing school dependant on the number of new homes proposed education contributions may be sought. • Cotes Heath: There is no school within this village the catchment school for this area is in Standon. • Creswell: There is no school within this village the catchment school for this area is in Stafford. • Croxton: There is no school within this village the catchment school for this area is in Eccleshall. • Gayton: There is no school within this village the catchment school for this area is in Weston. • Hilderstone: There is no school within this village the catchment school for this area is in Milwich. • Hopton: There is no school within this village the catchment school for this area is in Weston. • Hyde Lea: There is no school within this village the catchment school for this • area is in Stafford. • Ingestre: There is no school within this village the catchment school for this area is in Great Haywood. • Milford: There is no school within this village the catchment school for this area is in Stafford. • Milwich: There is limited capacity to expand the existing school dependant on the number of new homes proposed and education contributions may be sought. • Moreton: There is no school within this village the catchment school for this area is in Church Eaton. • Norbury: There is no school within this village the catchment school for this area is in Woodseaves. • Norton Bridge: There is no school within this village the catchment school for this area is in Eccleshall. • Oulton: There is potential to expand the existing school dependant on the number of new homes proposed and education contributions may be sought. • Ranton: Additional land adjacent to the existing school would be required to enable any expansion. • Salt: There is no school within this village the catchment school for this area is in Weston. • Seighford: Additional land adjacent to the existing school would be required to enable any expansion. • Stallington: There is no school within this village the catchment school for this area is in Fulford. • Swynnerton: There is no school within this village the catchment school for this area is in Yarnfield. <p>In November 2017, the Borough Council announced that the new Local Plan would also consider whether there should be a new garden settlement at land near to</p>

Response Reference	Full name of respondent	Comments
		<p>Swynnerton. Whilst it is noted that a garden town settlement is a concept, such a development would require significant infrastructure in terms of provision for primary and secondary aged pupils, the scale of which would depend on the proposed number of dwellings; as an example only 6,000 dwellings would require 6 FE of primary aged provision and 6 FE of secondary aged provision, the land for the new schools and cost of building the infrastructure would need to be met by developer contribution. Phasing of delivery of infrastructure and its funding will also need to be carefully considered and planned.</p> <p>In considering the spatial distribution of new housing growth Home to school transport should be factored in. Children in the villages without schools may be entitled to home to school transport where the catchment or nearest school is over two miles walking distance at primary or three miles at secondary. Should a proposed distribution of new homes result in additional dwellings falling into the home to school transport criteria there would be further implications in terms of transport costs, logistics and highway constraints around school sites. This could involve education contributions being sought towards and transport costs. Additionally Staffordshire County Council are required to consider the nature of the route to school and as a result have to provide free travel assistance when below walking distance in some cases — for example (this is not an exhaustive list), areas of Norbury to Woodseaves Primary, Cotwalton to Alleyne's High School, sections of Yarnfield Lane to Walton Priory Middle, and Tixall Road near Tixall Court and The Haywards to The Weston Road High School. For developments in areas where we are aware of this being the case, could involve education contributions being sought towards transport costs and/or improvements to the highway network.</p> <p>Education Other Comments — The "Settlement with Facilities" table</p> <ul style="list-style-type: none"> • The table indicates a school in Swynnerton, the Catholic Primary school closed in August 2007 due to falling school numbers. • The table indicates one school in Great Haywood this should be two schools. • The table should indicate one school in Little Haywood. • Milford the table incorrectly indicates a school. • The table should indicate one school in Seighford. • Aston by Stone and Hyde Lea are shown with schools these are a private prep school and grammar school respectively and as such do not factor in the planning of school places by Staffordshire County Council.
52	GVA on behalf of Taylor Wimpey	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.
53	Wardell Armstrong on behalf of Dean Lewis Estates	Initial consultation with Staffordshire County Council School Organisation Team has been undertaken. The development at Cold Meece will mitigate its impact upon school places in accordance with SCC Planning Obligations Policy. The option exists to upgrade the existing Primary School at Yarnfield, Springfields First School which is within walking distance of the site. The school has ample land within which to expand. Secondary school pupils would be schooled in Stone which is short direct bus ride away.
54	Lefroy, J. MP	Additional primary and secondary school provision is required particularly in the North and West of Stafford. I understand this forms part of existing plans. Stafford College requires additional support to ensure that students from Stafford have access to the widest possible range of apprenticeships/vocational qualifications.
62	Knights on behalf of Jonathan Lloyd Developments Ltd	As outlined previously in the event that the proposed housing development within our client's land at Hixon Airfield were to come forward it may create the need for - and can clearly accommodate - provision of a new school within the site.
66	Natural England	The data from the ongoing Cannock Chase SAC visitor survey may provide useful information to inform choices over the need and demand for educational provision in relation to the role of this important semi-natural habitat and landscape resource for tourism and recreation.
67	Hopton and Coton Parish Council	Apparently, schools are already planned for the Maximus 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?

Response Reference	Full name of respondent	Comments
3	Bramall, S.	A safe car park is needed for St Chad's in Slindon near Eccleshall.
12	Theatres Trust	We support the proposal for a new studio theatre in Stone, and if this development does not come forward as envisaged or has not been delivered by the time the Plan is in place we would suggest the Plan promotes the delivery of a community-scale theatre/arts centre within Stone.
23	Eccleshall Parish Council	(a) 24 hour accident and emergency provision at County Hospital, and well supported ambulance services. Improved provision of bus services in rural areas Car parking

Response Reference	Full name of respondent	Comments
		Increased capacity for GP surgeries/increase in opening hours. (b) Any large scale developments such as the proposed garden village should have to provide all necessary facilities within the site at their own cost.
28	Banham, D.	see answer to qu 2.
36	Ingestre with Tixall Parish Council	There is a need for walk-in health centres in the town centre.
39	Savills on behalf of Eccleshall landowners	(a) A new doctor's surgery in Eccleshall (b) Within Eccleshall. The current surgery is located in the village Centre but is constrained with limited / no opportunity to extend. We consider that land south of Stone Road could provide an opportunity to relocate the existing surgery facility to a new purpose built site with appropriate parking provisions, alongside a new residential development.
42	Jackson, J.	(b) The GP surgery in Great Haywood needs to extend its services and reinstate its outreach clinics just to accommodate the current residents. Since the developments under the last Local Plan, the surgery is no longer able to support the growing patient list and it is becoming impossible to book appointments, despite outreach clinics being withdrawn.
44	Colwich Parish Council	a) An additional /satellite Health Centre or GPs surgery is required and should be located in Weston to support both new and existing communities. b) It should be located in Weston to support Weston and the surrounding villages.
46	Stephen Locke Associates on behalf of landowners	(a) The local plan needs to embed the provision of social, recreational and cultural facilities and services within communities. We are a growing and ageing population and our health needs are getting more complex. At the point where a new large-scale residential development is identified, it would be necessary to plan for the health and social care needs of the newly expanded community. This would be dependent upon the anticipated demographic of the area. It is important to recognise that there are differences between local areas and different areas of the Borough has differing needs. There is a drive towards more care in the community but local community services need to be provided / upgraded to meet modern needs. Towns such as Stone could provide a focus for additional local community provision which may ease some of the pressure on the County's hospitals. (b) The proposed urban extension to the south-west of Stone would enable a variety of health, social and community facilities to be an integral part of the overall development scheme which would also benefit the existing community.
52	GVA on behalf of Taylor Wimpey	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.
53	Wardell Armstrong on behalf of Dean Lewis Estates	(a) Cold Meece lacks a community building that would provide a hub for social interaction, organised events and hosting clubs and group activities. The development at Cold Meece will deliver such a community resource building on site, serving the wider settlement. If deemed necessary and desirable by the NHS Clinical Commissioning Group the building can be built in such a way so as to accommodate a General Practitioner Consulting facility, thereby enhancing the GP provision in this part of the rural community in Stafford Borough. (b) The facility will be located on site at Cold Meece and will form a central hub feature at the heart of the new community.
54	Lefroy, J. MP	<ul style="list-style-type: none"> • Many Health Centres in the Borough require expansion and hence possible relocation – for instance Weeping Cross and Rising Brook. • County Hospital's A&E department should be restored to 24/7 as soon as possible. • Every new development of any size needs to have a community centre which can be multi-use – for instance by churches, clubs and other groups. Some school buildings can be used by the community at weekends and during holidays, providing them with additional income.
62	Knights on behalf of Jonathan Lloyd Developments Ltd	(a) As outlined previously in the event that the proposed housing and economic development within our client's land at Hixon Airfield were to come forward it would create the need for - and can clearly accommodate - provision of new health, social and community facilities within a new local/village centre within the site. (b) see above
66	Natural England	We refer the Council to our 'use and enjoyment of the natural environment' link (See Q17 above) as important context for consideration of where such facilities might be located.
67	Hopton and Coton Parish Council	Perhaps the Maximus development which is planned for the Hopton area should have a new surgery. Wherever this is placed, there should be a decent infrastructure so that people can get to it.

Question 20: What approach could the Local Plan take to ensure that issues relating to pollution and air quality are minimised?

Response Reference	Full name of respondent	Comments
3	Bramall, S.	What are the options? There seem to be a lot of lorries on A519, which could go on motorway or A34.
36	Ingestre with Tixall Parish Council	There is a need for better designation of HGV routes to offset use of inaccurate Sat Navs and foreign drivers with poor English. Currently many HGVs have to turn round in Tixall Village or by Tixall Obelisk when they find they cannot go any further.

Response Reference	Full name of respondent	Comments
37	Knights on behalf of Birch House Lane Industrial Estate	Support more housing and employment sites in rural locations in order to serve the rural community and thus reduce emissions as a result of the reduced need to commute in accordance with paragraphs 78 and 83 of the Framework. Spreading housing and economic development across the Borough rather than directing it primarily to larger urban areas would reduce congestion and associated pollution / air quality problems in and around the larger urban areas.
40	Woodland Trust	We would like to see the role of street trees recognised in your local plan for their ability to absorb pollutants and hence improve air quality. The type of tree that is planted and the location is crucial: the best place to plant trees for this purpose is at busy road junctions. Further information can be found at https://www.woodlandtrust.org.uk/publications/2012/04/urban-air-quality
44	Colwich Parish Council	The Local Plan could help to reduce road traffic by providing better bus services and proper, safe cycle routes. There should be no parking near to schools and more use should be made of walking buses. There should also be speed restrictions near to schools. Park and Ride services for Stafford town centre would help and this would allow the town centre to be pedestrianised. Electrification of local transport would help to reduce pollution and more electric vehicle charging points need to be installed.
46	Stephen Locke Associates on behalf of landowners	The government in National Planning Guidance makes it clear that air quality and pollution should be improved. The Local Plan can encourage non-polluting activities and improvements to air quality through the promotion of such technology as electric charging points for vehicles and renewable and sustainable energy sources such as solar panels. Sustainable transport systems can also have a significant role in improving health and wellbeing. When creating new large-scale developments, these initiatives and systems can be integrated at the outset.
48	GVA on behalf of St Philips	It is St Philips view, that any potential development sites that are being considered as an allocation within the emerging Local Plan should be considered in light of their location and accessibility to amenities, facilities and services, together with sustainable transport opportunities. By their virtue, this would lead to a reduction in issues relating to pollution and air quality, ensuring that adverse impacts are minimised. As demonstrated in the supporting Vision Document, the land at Castle Street is located on the edge of Eccleshall outside of the existing Settlement Boundary. The site is located approximately 200m to the north-east of the main high street and town centre. A 2m footway is provided along the western side of Castle Street, whilst footways are provided on both sides of the highways circa. 100m to the south of the site. St Philips have commissioned a Transport Assessment for the proposed development site. This demonstrates that the site is located in close proximity to a number of facilities and amenities, including a supermarket, GP Surgery and Pharmacy, Post Office and Primary School. These are all located within a 10 minute walk of the site, as summarised in the table below. [See table in full response] The nearest bus stops are located on Castle Street, immediately opposite the site, which provides northbound services. Another bus stop is located circa. 75m south of the site and provides southbound services. The table below summarises local bus provision from these services. [See table in full response] There are multiple services provided from Stone, including services reserved for school pupils who may need to access secondary schools. In addition, Service 14 provides hourly connections to Stafford with journeys taking approximately 20 minutes. The nearest rail station is located in Stafford and can be accessed from the site via the number 14 bus service in approximately 20 minutes. Rail services include: <ul style="list-style-type: none"> • 3 per hour to Birmingham New Street; • 3 per hour to Liverpool; • 2 per hour to London Euston; • 2 per hour to Manchester; • 1 per hour to Bournemouth; and • 1 per hour to Bristol. It is noted that Stafford Railway Station will become a hub station to for HS2. Namely, the 'Stafford Station Gateway Masterplan' proposes the development of land near to the railway station will include up to 650 apartments, 150 dwelling houses, a multi-storey car park and leisure facilities. HS2 aims to reduce journey times to London from one hour fifty five minutes to fifty minutes. It can therefore be demonstrated that the land at Castle Street is well connected to the surrounding highway network and is conveniently located to existing key amenities which are within a reasonable walking distance to serve future residents. The site is served by pedestrian links, together with bus services to nearby major centres, including Stone, Stafford and Stoke-on-Trent. It is therefore considered that development at the site would seek to reduce the impacts relating to pollution and air quality, thus affording a highly sustainable development site.
51	Wardell Armstrong on behalf of Barratt Homes and David Wilson Homes Mercia	As recognised within para. 103 of the NPPF, significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. Para 7.21 of the SHELAA methodology consultation confirmed that sites which may be considered 'unsuitable' under the existing planning policy regime will now be assessed where they are adjacent to an existing settlement as this may allow the reasonable expansion of settlements (including Stone) in a sustainable manner, and which enable opportunities to promote walking, cycling and public transport (NPPF para 102c). Serious consideration should be given to sites adjacent to Stone which are considered as 'unsuitable' under the current policy documentation as they offer opportunities to promote walking, cycling and the use of public transport.

Response Reference	Full name of respondent	Comments
54	Lefroy, J. MP	<ul style="list-style-type: none"> • Encouraging the use of electric/hybrid buses and cars through local regulations and provision of charging points. • Adopting a zero-tolerance approach to litter and fly-tipping.
57	Pegasus Group on behalf of Richborough Estates, Gnosall	The new Local Plan should identify and deliver the most sustainable pattern of growth across the plan period. Significant development should be focused on locations which are, or can be made sustainable. Clearly there are sustainability advantages from directing development to locations such as Stafford and Stone but the NPPF also recognises the need to promote sustainable development in more rural areas, and that new housing should be located where it will enhance or maintain the vitality of rural communities. Consequently, there is also a role for villages in the delivery of new housing.
58	Pegasus Group on behalf of Richborough Estates, Weston	The new Local Plan should identify and deliver the most sustainable pattern of growth across the plan period. Significant development should be focused on locations which are, or can be made sustainable. Clearly there are sustainability advantages from directing development to locations such as Stafford and Stone but the NPPF also recognises the need to promote sustainable development in more rural areas, and that new housing should be located where it will enhance or maintain the vitality of rural communities. Consequently there is also a role for villages in the delivery of new housing.
59	Pegasus Group on behalf of Richborough Estates, Stone	The new Local Plan should identify and deliver the most sustainable pattern of growth across the plan period. Significant development should be focused on locations which are, or can be made sustainable. Clearly, there are sustainability advantages from directing development to locations such as Stafford and Stone but the NPPF also recognises the need to promote sustainable development in more rural areas, and that new housing should be located where it will enhance or maintain the vitality of rural communities. Consequently, there is also a role for villages in the delivery of new housing.
60	Pegasus Group on behalf of Lovell Partnerships	The new Local Plan should identify and deliver the most sustainable pattern of growth across the plan period. Significant development should be focused on locations which are, or can be made sustainable, thus limiting the need to travel and thus reducing congestion and emissions, as well as improving air quality and public health.
62	Knights on behalf of Jonathan Lloyd Developments Ltd	Support more housing and employment sites in rural locations in order to serve the rural community and thus reduce emissions as a result of the reduced need to commute in accordance with paragraphs 78 and 83 of the Framework. Spreading housing and economic development across the Borough rather than directing it primarily to larger urban areas would reduce congestion and associated pollution / air quality problems in and around the larger urban areas.
66	Natural England	Natural England looks forward to working with the Council to forge shared understanding of the evidence base relating to air quality and the scope for measures to address poor air quality and its effects through the revised NPPF.
67	Hopton and Coton Parish Council	Get rid of traffic lights because it has been proved that a lot of air pollution is caused by cars waiting at traffic lights – have lots of mini-roundabouts instead.

Question 21: There is a growing need to deliver the infrastructure required to support sustainable transport choices. What could the Plan do to help you make more sustainable transport choices?

Response Reference	Full name of respondent	Comments
3	Bramall, S.	Cycling is so popular now, but there are very few safe cycle / walking / wheelchair / pram paths in the borough. Why not be ambitious and aim to make Stafford the most pedal-friendly town by 2040? What would this take? It would put the borough on the map and give us a real USP, as well as reducing emissions and ensuring a healthier population. Presumably, there will be a need for more electric charging points.
13	Sport England	The plan should seek to embed Active Travel into development proposals delivering environments that encourage walking and cycling.
23	Eccleshall Parish Council	Eccleshall PC is an advocated of rural transport networks and with the funding cuts from central government these services are diminishing.
28	Banham, D.	Firstly, it is fallacy to consider that private vehicle usage can be reduced in the time scale of this local plan, and even beyond that. Vehicle ownership is increasing as the populations affluence increases; just look at the number of cars parked outside the majority of houses. Secondly, local public transport services could be improved. Over the last decade there has been a steady decline in the level of provision of local public transport (i.e. buses) and this needs to be reversed. Public transport also needs to be more sustainable (to eliminate dirty diesel exhausts) and this should be applied to both buses, taxis and private hire cabs.
35	Highways England	As set out in our response to question 2, there is a need for the Borough to develop a robust transport evidence base to underpin the new Local Plan. This will enable any necessary infrastructure to be identified and for strategies to be developed for their timely funding and delivery. The transport evidence base should be developed in consultation with key transport providers including the local highways authority (SCC) and Highways England,
36	Ingestre with Tixall Parish Council	There is a need for continuous cycle routes not intermittent ones which disappear at junctions at junctions and crossroads as at present.
44	Colwich Parish Council	The Local Plan should promote the reinstatement of bus services to all the borough. The Borough Council should be dedicated to maintaining proper bus services in remote areas (even if this is uneconomic).
46	Stephen Locke Associates on behalf of landowners	Stafford Borough is substantially rural and cars are the primary means of transport for many residents. We accept that consideration needs to be given to how this reliance on cars can be reduced and the use of more sustainable modes of transport encouraged. There are particular stretches of roads or junctions in the District

Response Reference	Full name of respondent	Comments
		that can become congested such as the roundabout where the B5026 meets the A34 at Stone. Infrastructure is needed to support new growth and key priorities for infrastructure improvements. Locating employment land close to where people will live will help to encourage people to live close to their work. Improved public transport corridors are important but it is vital that key areas of congestion are reduced as this will merely slow down all traffic, including public transport such as bus routes.
53	Wardell Armstrong on behalf of Dean Lewis Estates	At the strategic level the opportunity exists to exploit the already good public transport links connecting Cold Meece with Stafford, Stone and the forthcoming HS2 Infrastructure Maintenance Depot that will create a new major employment opportunity within 3km of the major brownfield Cold Meece Development Opportunity. Capturing the benefits of HS2 is a major government objective. Enhanced public transport provision delivered by HS2 should, as well as delivering greater and efficient public transport provision around Stafford and Stone with the new HS2 hub station at Stafford, deliver enhanced public transport connectivity to the rural areas to optimise HS2 usage. Doing so will also enhance the economic prosperity of the region. More locally, Coldmeece is set within a major corridor of economic and social activity between Eccleshall and Stone. This area will have an even stronger identity with the delivery of the Stone HS2 IMD facility. The recently completed Norton Bridge rail improvements have improved accessibility in the area by road, which will be enhanced further by HS2 infrastructure upgrades. Coldmeece is served by the No14 Bus service which links Stoke-on-Trent, Stone, Eccleshall and Stafford. This operates predominantly to serve the significant employment levels by the routeing through Coldmeece from approximately 7am to 7pm in either direction hourly, with a reduced weekend service. Development at Cold Meece will reinforce the long-term commercial viability of this excellent public transport service.
54	Lefroy, J. MP	<ul style="list-style-type: none"> • See answer a) to Q20. • Supporting the further development of a network of community transport to supplement commercial transport. • Ensuring that the Borough develops and improves the cycling network and does not permit any further major developments which do not take sustainable transport seriously.
57	Pegasus Group on behalf of Richborough Estates, Gnosall	See response to Question 20.
58	Pegasus Group on behalf of Richborough Estates, Weston	See response to Question 20.
59	Pegasus Group on behalf of Richborough Estates, Stone	See response to Question 20.
60	Pegasus Group on behalf of Lovell Partnerships	See response to Question 20.
62	Knights on behalf of Jonathan Lloyd Developments Ltd	The Plan could facilitate higher levels of housing and employment growth in the more sustainable locations in the rural area to improve the prospects of existing local services being maintained - and also facilitate provision of additional local services within the rural area in tandem with future growth - in order to reduce the need to travel long distances and maintain and increase the potential for/frequency of trips within the rural area to be undertaken using sustainable modes of transport.
67	Hopton and Coton Parish Council	Many of the bus routes are fragmented at the moment. There should be one major bus route taking in many of the villages and going through Stafford and to the hospital. The Local Plan should promote the reinstatement of bus services to all the borough. The Borough Council should be dedicated to maintaining proper bus services in remote areas (even if this is uneconomic).

Question 22: Are there any specific sustainable transport projects that the Council should be promoting as part of the Local Plan? If yes, please provide some detail about the project.

Response Reference	Full name of respondent	Comments
3	Bramall, S.	See above re making the borough more attractive and accessible for pedestrians, cycles, wheelchairs and prams and mobility scooters. This includes more safe footpaths in the countryside – as the roads are very dangerous to walk along and footpaths disappear. Eg from Eccleshall town to Pershall Park is very dangerous, so people drive.
23	Eccleshall Parish Council	Eccleshall has the Eccleshall Voluntary Car scheme, which has recently started to operate within the Parish. Run by volunteers, and with a network of DBS checked volunteer drivers, the scheme is aimed at local residents who do not have access to public transport or a car. The passenger pays a set fee based on mileage to the driver. Types of journeys are expected to be to GP and hospital appointments, collecting prescriptions, shopping trips, social trips to friends, library visits and short

Response Reference	Full name of respondent	Comments
		journeys up to 20 miles. Users 'join the club' to register their details and it is hoped bookings will be made a week or so in advance to allow time to co-ordinate available drivers.
39	Savills on behalf of Eccleshall landowners	Improvements to public transport, particularly to serve key service villages should be encouraged. The local plan should make provision for improvements to public transport to enable delivery of development within these locations.
44	Colwich Parish Council	See answer to question 21. Also in Stafford town centre bicycles for hire should be available as they are in London.
46	Stephen Locke Associates on behalf of landowners	In the short to medium term, we will continue to have dependence on the car for transport needs. The way forward would be to take advantage of smart technologies, new working practices and shared mobility so we are less car-dependent for those trips where we genuinely are car-dependent. A key transport project would be the connection of the A34 to the B5026 to the south-west of Stone. This would encourage inward investment into the town and alleviate traffic problems, thus strengthening Stone's role as a key settlement within the Borough. The scale of the strategic site is sufficiently sustainable to allow funds to be generated to improve accessibility to the town centre by means including footpaths, cycleways and public transport.
53	Wardell Armstrong on behalf of Dean Lewis Estates	At the strategic level the opportunity exists to exploit the already good public transport links connecting Cold Meece with Stafford, Stone and the forthcoming HS2 Infrastructure Maintenance Depot that will create a new major employment opportunity within 3km of the major brownfield Cold Meece Development Opportunity. Capturing the benefits of HS2 is a major government objective. Enhanced public transport provision delivered by HS2 should, as well as delivering greater and efficient public transport provision around Stafford and Stone with the new HS2 hub station at Stafford, deliver enhanced public transport connectivity to the rural areas to optimise HS2 usage. Doing so will also enhance the economic prosperity of the region. More locally, Coldmeece is set within a major corridor of economic and social activity between Eccleshall and Stone. This area will have an even stronger identity with the delivery of the Stone HS2 IMD facility. The recently completed Norton Bridge rail improvements have improved accessibility in the area by road, which will be enhanced further by HS2 infrastructure upgrades. Coldmeece is served by the No14 Bus service which links Stoke-on-Trent, Stone, Eccleshall and Stafford. This operates predominantly to serve the significant employment levels by the routing through Coldmeece from approximately 7am to 7pm in either direction hourly, with a reduced weekend service. Development at Cold Meece will reinforce the long-term commercial viability of this excellent public transport service.
54	Lefroy, J. MP	<ul style="list-style-type: none"> • See answer b) to Q21. • Consider establishing a Borough-owned transport company to tackle 'market failure' on certain routes – or expanding community transport to do that. • Producing and implementing a comprehensive plan for safe cycling throughout the Borough.
67	Hopton and Coton Parish Council	See answer to question 21.

Question 23: What economic development opportunities do you consider could arise from HS2 for the Borough?

Response Reference	Full name of respondent	Comments
3	Bramall, S.	The main thing that springs to mind is that parking at the station will be even more of a problem than it is now. If the borough wants to attract day trippers / visitors, then it needs to give people a reason to come to Stafford – such as a major new gallery that would put the town on the map.
23	Eccleshall Parish Council	Increased employment opportunities during the construction phase Potential for permanent employment at the railhead site Improved highways around Yarnfield and the potential for a new M6 junction near to the Railhead would support economic development. Direct links to HS2 at Stafford station will be beneficial to the Borough in many ways, may encourage commuter settlement and support the idea of the development around the station area.
28	Banham, D.	All HS2 will do is add the town to the list of commuter towns that can service London. When HS2 connects with the Northern Power house cities then we may see a swing in economic activity, but that will still make Stafford a commuter town. better make sure that the HS2 station has a large car park!
37	Knights on behalf of Birch House Lane Industrial Estate	A potential New Garden Village at the MoD site in Cold Meece is already being mooted to meet the Borough's housing needs. It is suggested that if this scheme were to come forward, then the site at Birch House Lane Industrial Estate (which adjoins the MoD site) should be incorporated into the masterplan for its development on account of its partial brownfield status in accordance with paragraph 117 of Framework.
44	Colwich Parish Council	There are no opportunities from HS2 in the Borough.
46	Stephen Locke Associates on behalf of landowners	The proposed railhead terminus and construction yard for HS2 to the west of Stone would help to create employment in the construction industry and potentially create permanent jobs. It is important that transport links proposed as part of the HS2 transport project are integrated with the new development proposals for Stone. It would be unfortunate if the infrastructure benefits provided by HS2 would not be adequately linked to the local infrastructure needs. HS2 provides a wider

Response Reference	Full name of respondent	Comments
		<p>transport and environmental opportunity and it is therefore imperative for the Borough to work closely with HS2 to ensure that the maximum benefits are achieved for the area.</p> <p>Consideration could be given to the early creation of local infrastructure to alleviate potential traffic problems caused by HS2. This could have long-term benefits for the wider community both in terms of improved transport links and reduced congestion.</p>
51	Wardell Armstrong on behalf of Barratt Homes and David Wilson Homes Mercia	<p>The development of HS2 in the Borough brings with it a need to actively plan and prepare to take advantage of the economic benefits arising from HS2 and that build on current strengths and on current key priority sectors – this cannot be left to happenstance. The decision to locate the permanent Stone Infrastructure Maintenance Base-Railhead will transform connectivity advantages of the Borough, provide significant supply chain opportunities for leading engineering and construction businesses and provide a focus in driving up skill levels.</p> <p>High Speed Two Phase Two Economic Case, Moving Britain Ahead (DfT July 2017) reports on the economic impacts and benefits of HS2 at a wider level, pointing to impacts which are not a direct result of the transport investment – such as travel time savings. These can include:</p> <ul style="list-style-type: none"> • Higher foreign investment into the UK, as it is a more attractive investment location due to better transport; • Dynamic clustering, where businesses relocate to be closer together, forming clusters around well-connected places and benefiting from knowledge sharing; • Workers moving to more productive jobs, in response to changes in transport costs, to areas that have higher productivity due to a variety of factors such as agglomeration and capital; and • Dependent development, where property developers may react to the transport improvements from HS2 by upgrading housing stock, which could lead to regeneration. <p>The previous Employment Land Review undertaken for the Plan for Stafford in 2012 contains no reference to HS2 and will clearly need to provide a clear assessment of the longer term requirements arising from such impacts.</p> <p>It is clear that growth will take place and will put pressure on an already stressed housing market. If supply remains restricted, the increased demand for homes will push up house prices. Matching housing and economic growth will be essential to ensure regeneration benefits are secured.</p> <p>It will be important to ensure there is not an over reliance on larger strategic sites with longer lead-in times and significant up-front infrastructure improvements. BDWH seek to promote a site at Walton Heath on the edge of Stone. The allocation of such a site would be able to be delivered within a short timescale and ensure a timely provision of housing serving both the construction stage and during the operation of the railhead once HS2 services are fully operational in 2033. As a Tier 2 settlement Stone performs highly against all the sustainability criteria set out in the Settlement Hierarchy Consultation; namely;</p> <ul style="list-style-type: none"> • High quality retail and shopping facilities within the town centre including convenience, comparison and supermarkets; • A range of other facilities including restaurants, post office, GP surgery, dentist, library, banks and places of worship; • A wide range of community facilities such as Primary and secondary schools, community centres and leisure facilities; • Good access to public transport including rail services to Euston and regular bus services; and • Allocated employment areas and future employment growth arising from HS2. <p>Stone is recognised as a dynamic growth point able to maximise the benefits arising from HS2.</p>
53	Wardell Armstrong on behalf of Dean Lewis Estates	<p>At the strategic level the opportunity exists to exploit the already good public transport links connecting Cold Meece with Stafford, Stone and the forthcoming HS2 Infrastructure Maintenance Depot that will create a new major employment opportunity within 3km of the major brownfield Cold Meece Development Opportunity. Capturing the benefits of HS2 is a major government objective. Enhanced public transport provision delivered by HS2 should, as well as delivering greater and efficient public transport provision around Stafford and Stone with the new HS2 hub station at Stafford, deliver enhanced public transport connectivity to the rural areas to optimise HS2 usage. Doing so will also enhance the economic prosperity of the region.</p> <p>More locally, Coldmeece is set within a major corridor of economic and social activity between Eccleshall and Stone. This area will have an even stronger identity with the delivery of the Stone HS2 IMD facility.</p> <p>The recently completed Norton Bridge rail improvements have improved accessibility in the area by road, which will be enhanced further by HS2 infrastructure upgrades.</p> <p>Coldmeece is served by the No14 Bus service which links Stoke-on-Trent, Stone, Eccleshall and Stafford. This operates predominantly to serve the significant employment levels by the routing through Coldmeece from approximately 7am to 7pm in either direction hourly, with a reduced weekend service. Development at Cold Meece will reinforce the long-term commercial viability of this excellent public transport service.</p>
54	Lefroy, J. MP	<p>The opportunities will arise from development at and close to Stafford station. It is essential that HS2 is used to draw people to Stafford and the Borough for work rather than to make the Borough more of a commuting area to other places.</p>
57	Pegasus Group on behalf of Richborough Estates, Gnosall	<p>HS2 represents a significant opportunity for promoting growth within the Borough, particularly at Stafford Town, which is identified as benefitting from a planned station stop, and Stone where there are proposals for a new maintenance depot. The new Local Plan should take this into account when considering the spatial distribution of residential and employment growth.</p> <p>HS2 also has implications for Stafford Borough in respect of the level and amount of growth to be planned for in the new Local Plan. The standard method for calculating housing need introduced by the Government is based on demographic forecasts and does not take economic growth into consideration. It is widely acknowledged that HS2 is likely to result in economic growth and Stafford Borough Council should accordingly consider planning for growth above the minimum level identified by the methodology.</p>

Response Reference	Full name of respondent	Comments
58	Pegasus Group on behalf of Richborough Estates, Weston	HS2 represents a significant opportunity for promoting growth within the Borough, particularly at Stafford Town, which is identified as benefitting from a planned station stop, and Stone where there are proposals for a new maintenance depot. The new Local Plan should take this into account when considering the spatial distribution of residential and employment growth., HS2 also has implications for Stafford Borough in respect of the level and amount of growth to be planned for in the new Local Plan. The standard method for calculating housing need introduced by the Government is based on demographic forecasts and does not take economic growth into consideration. It is widely acknowledged that HS2 is likely to result in economic growth and Stafford Borough Council should accordingly consider planning for growth above the minimum level identified by the methodology.
59	Pegasus Group on behalf of Richborough Estates, Stone	HS2 represents a significant opportunity for promoting growth within the Borough, particularly at Stafford Town, which is identified as benefitting from a planned station stop, and Stone where there are proposals for a new maintenance depot. The new Local Plan should take this into account when considering the spatial distribution of residential and employment growth. HS2 also has implications for Stafford Borough in respect of the level and amount of growth to be planned for in the new Local Plan. The standard method for calculating housing need introduced by the Government is based on demographic forecasts and does not take economic growth into consideration. It is widely acknowledged that HS2 is likely to result in economic growth and Stafford Borough Council should accordingly consider planning for growth above the minimum level identified by the methodology.
60	Pegasus Group on behalf of Lovell Partnerships	HS2 represents a significant opportunity for promoting growth within the Borough, particularly at Stafford Town, which is identified as benefitting from a planned station stop. The new Local Plan should take this into account when considering the spatial distribution of residential and employment growth, in particular, by considering the co-location of development in the proximity of the planned stop. HS2 also has implications for Stafford Borough in respect of the level and amount of growth to be planned for in the new Local Plan. The standard method for calculating housing need introduced by the Government is based on demographic forecasts and does not take economic growth into consideration. It is widely acknowledged that HS2 is likely to result in economic growth and Stafford Borough Council should accordingly consider planning for growth above the minimum level identified by the methodology.
67	Hopton and Coton Parish Council	There are no opportunities from HS2 in the Borough.

Question 24: Are there any specific transportation projects that the Council should be promoting in the Local Plan? If yes, please provide some detail on the project, its location and the reason why you believe it is necessary.

Response Reference	Full name of respondent	Comments
3	Bramall, S.	As above re cycling. Supporting community transport services which have started recently – such as the one in Eccleshall.
23	Eccleshall Parish Council	See question 22.
28	Banham, D.	The town's road infrastructure is already struggling at peak times on a week day and weekends and the slightest exacerbation to the network from road works, shut roads, accidents, or problems with M6 result in very significant amounts of congestion and stationary vehicles are wasting energy and creating unnecessary pollution (directly or indirectly) as a result. The town's road network is fundamentally flawed, having been designed for small market town in the days where vehicle ownership was modest. Now with vehicle ownership per household being relatively high, and combined with commercial traffic, the town's growing population has out grown the town's road network capacity. Thus, in order for the town to prosper, it needs new roads to spread/disburse the traffic load and certainly lower the volume approaching the gyratory.
35	Highways England	At the present time, Highways England is not aware of any specific transportation projects that the Council should be promoting in the Local Plan. However, it should be noted that Highways England has embarked on a major scheme on the M6 motorway between Junctions 13 and 15 currently scheduled to be complete by 2021/2022. The scheme is to make this section of the M6 a smart motorway, which means increased capacity.
36	Ingestre with Tixall Parish Council	There is a need for alternative through route to the east of Stafford with a river crossing as proposed originally by the EDR.
44	Colwich Parish Council	The Local Plan should promote the joining of the eastern ring road from the end of Beaconside to Baswich, crossing the A513 to the A34.
46	Stephen Locke Associates on behalf of landowners	As identified above, we feel that a new highway link to the south-west of Stone, connecting the A34 with the B5026 would have major local social and economic benefits.
53	Wardell Armstrong on behalf of Dean Lewis Estates	HS2 also offers the opportunity to create a new junction onto and off the M6 Motorway. Presently the HS2 proposals are equivocal as to whether the new junction should serve HS2 only or serve the wider network. The opportunity to enhance the connectivity of Stone and the surrounding rural hinterland to the strategic motorway way network should be fully pursued in the form a new unrestricted motorway junction.

Response Reference	Full name of respondent	Comments
		The distance between Stafford North and Stoke South is some 12 miles. To introduce a new junction almost equidistant between the two will secure major transport benefits for the area, shortening journeys to the motorway and lessening the throughput of traffic on the local road network.
54	Lefroy, J. MP	<ul style="list-style-type: none"> • Development of community transport. • Encouragement of low emission vehicles through (eg) provision of more charging points. • Comprehensive plan for cycling.
66	Natural England	We refer the Council to our response to Q20.
67	Hopton and Coton Parish Council	Please see previous answers.

Question 25: National policy reinforces good design as a key aspect of sustainable development and provides support to ensure high standards of design generally. Should closer ties with the local design panel be established to provide assessment and support for major or particularly complex or sensitive development proposals?

Response Reference	Full name of respondent	Comments
3	Bramall, S.	<p>What is local design panel? The document does not explain.</p> <p>The recent developments seem to include very little green space in terms of gardens and landscaping. Can planning policy include a minimum area/ % of landscaping. Attractive and affluent towns are often described as “leafy” and are attractive to tourists as well as residents.</p> <p>The plan should provide more clarity over “sustainable development” – do you mean designed to Code 6 standard?</p> <p>Can you set design standards to include sustainable materials, more interesting architectural features (rather than identikit boxes).</p>
21	Seddon Homes	<p>Ensuring high quality developments are delivered is important. We would welcome a willingness from the Council to engage at early stages of site promotion to offer feedback and guidance, including on elements of design where necessary, so that comments can be taken on board before an application is submitted. The NPPF encourages pre-application and early engagement, noting the potential this has to improve the efficiency and effectiveness of the planning application for all parties.</p> <p>However, we would not support a mandatory requirement for pre-application engagement with the local design panel prior to an application being submitted.</p> <p>Whilst pre-application engagement has the potential to reduce matters of disagreement / difference once an application has been submitted, there are instances where timing / programme do not allow for lengthy or prolonged pre-application engagement. Local design panels can sometimes work on the basis of only having monthly meetings, therefore, providing a single opportunity each month to obtain feedback. If this was the case, a requirement to meet with the local design panel prior to submitting an application could cause delays and impact on programme.</p>
23	Eccleshall Parish Council	Yes – the Borough should take a strong lead from guidance provided by the local design panel, to ensure the correct design of houses within settlements which have a strong design identity, such as Eccleshall.
38	Indigo Planning on behalf of CEG	<p>It is accepted that good design is important and new development coming forward should be of a high standard and reflective of its surroundings. This is set out at paragraph 124 of the NPPF, which notes “good design is a key aspect of sustainable development, creates better places in which to live and work and helps makes development acceptable to communities”. However, there would be objection to any mandatory requirement for all major development schemes to have to engage in pre-application discussions with the local design panel.</p> <p>We do welcome a willingness from the Council to engage and offer feedback and comments, including on design, during site promotion and / or application preparation workstages. There are merits to early engagement and as set out in the NPPF (paragraph 39) “early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties”, having the potential to reduce matters of disagreement once an application has been submitted.</p> <p>However, there are instances where timing/programme does not allow for lengthy and prolonged pre-application discussions with various departments / panels. Local design panels can often have a pre-set programme of potential meeting dates and sometimes these may be restricted to one opportunity per month to meet and received feedback from the panel. If this was the case and there was a mandatory requirement to engage with the Local Design Panel before submitting an application, this could in some instances impact upon project timeframes.</p>
44	Colwich Parish Council	Yes there should be closer ties with the local design panel. The Local Plan should encourage respect for the Local Green Infrastructure Plan and for the Local Design Plan.
46	Stephen Locke Associates on behalf of landowners	<p>We agree that all new developments should be of a high design standard that reflect and respects the local character, setting and local context.</p> <p>Closer ties with the local design panel would identify projects where early engagement can have a positive impact on the design process. We recognise that large scale projects require significant front-loading in terms of design and consultation, but liaison with design panels must be proportional and timely so that constructive comments and guidance on schemes can be acted upon and sites can be bought online for development in a timely way.</p>
48	GVA on behalf of St Philips	It is St Philips position that, where applicable, a local design panel should be established and engaged to support the on-going masterplanning of potential development sites, where they are of a major scale, are particularly complex, or are sensitive in nature.

Response Reference	Full name of respondent	Comments
		St Philips consider it critical however that any such Design Panel should be fully accessible to the planning application process and that the potential for delay minimised. It is also important that any Design Panel Reviews are undertaken alongside the consideration of key technical matters to ensure that these are positively considered in light of the wider site opportunities and constraints.
53	Wardell Armstrong on behalf of Dean Lewis Estates	It is considered that the Local Plan policies should enshrine the principles of high quality design to ensure that the environment within which communities live work and seek recreation function to their optimum potential and are regarded as attributes to the area.
54	Lefroy, J. MP	Yes
57	Pegasus Group on behalf of Richborough Estates, Gnosall	The new Local Plan should establish design principles but should not be prescriptive so as to stifle innovative design or flexibility, in accordance with Paragraph 127 of the NPPF.
58	Pegasus Group on behalf of Richborough Estates, Weston	The new Local Plan should establish design principles but should not be prescriptive so as to stifle innovative design or flexibility, in accordance with Paragraph 127 of the NPPF.
59	Pegasus Group on behalf of Richborough Estates, Stone	The new Local Plan should establish design principles but should not be prescriptive so as to stifle innovative design or flexibility, in accordance with Paragraph 127 of the NPPF.
60	Pegasus Group on behalf of Lovell Partnerships	The new Local Plan should establish design principles but should not be prescriptive so as to stifle innovative design or flexibility, in accordance with Paragraph 127 of the NPPF.
67	Hopton and Coton Parish Council	Yes there should be closer ties with the local design panel. The Local Plan should encourage respect for the Local Green Infrastructure Plan and for the Local Design Plan.

Question 26: What could the Plan do to protect and enhance the Borough's Heritage Assets?

Response Reference	Full name of respondent	Comments
3	Bramall, S.	This seems to be done well by the heritage officer and Historic England.
4	Historic England	The statements in the associated text (3.60-3.64) are welcome, and appropriate cross-reference the contribution that the historic environment makes to areas such as the local economy, local distinctiveness, communities and tourism. Good reference is also made in broad terms to some forms of characteristic heritage asset types of the area, and there is also clear recognition that the conservation and enhancement of the historic environment should be a proactive exercise within the local plan. In broad terms, we would also encourage consideration to be given to proactively pursuing opportunities to aid in the promotion, understanding and protecting of heritage assets as a means of maximising the wider public benefits they contribute. As above, a robust evidence base will be key in identifying what the plan can do to best protect and enhance the borough's heritage assets.
23	Eccleshall Parish Council	All proposed changes to Heritage Assets should be properly assessed to allow for sympathetic regeneration that retains key characteristics but also allows for assets to be repurposed if the alternative was to fall into a state of disrepair.
36	Ingestre with Tixall Parish Council	The Shire Hall and Carnegie Library buildings should be restored and reused to provide a sustainable community facility, not just more residential development.
44	Colwich Parish Council	The Plan should protect Borough assets by using the assets for something appropriate, by finding new uses for redundant buildings, if necessary.
46	Stephen Locke Associates on behalf of landowners	We recognise that the Borough is rich in terms of its Heritage Assets. A proportionate approach should be taken with regard to the importance of Heritage Assets. Any new development should respect the guidance in Chapter 16 of the recently amended NPPF 2018.
54	Lefroy, J. MP	It could identify them and then describe action which can and will be taken – for instance, listing the buildings and producing clear plans on action for those which are empty or not fully used.

Question 27: What approach should the Local Plan take to ensure that Borough's landscape, AONB and its key features are protected and enhanced?

Response Reference	Full name of respondent	Comments
3	Bramall, S.	Better maintenance of public footpaths including signage and access routes.
4	Historic England	We would note here that the borough's landscape, including the AONB, is a 'cultural landscape' which has been shaped by the area's history and human activity over the centuries. As such, the historic environment is a notable element of the borough's landscape that merits careful consideration. As you will be aware, the

Response Reference	Full name of respondent	Comments
		Cannock Chase AONB is currently undergoing a Management Plan review and it would be beneficial to liaise with the historic environment information available as a result of this process.
23	Eccleshall Parish Council	They should continue to be protected.
44	Colwich Parish Council	No development should be allowed to encroach on the AONB. Any development adjacent to a Borough landscape should be sympathetic.
46	Stephen Locke Associates on behalf of landowners	Any new development should demonstrate that its impact on the landscape has been considered and future planning decisions should ensure that areas of high landscape value are should be conserved, protected and where appropriate, enhanced. Where possible, land for development should be allocated on land which has the least environmental and amenity value. Large scale development sites should be supported by a landscape and visual impact assessments where necessary.
49	Staffordshire County Council	Paragraph 3.67 refers to the Landscape Character Assessment (LCA), Planning for Landscape Change. Staffordshire County Council has completed a Draft Landscape Character Assessment Review for Staffordshire (unpublished). This updated LCA incorporates evidence from the Historic Landscape Characterisation for Staffordshire. There would be benefit to the Borough from using and building on this updated assessment as supporting evidence to inform potential site allocations, policy development and in its decision making. The Draft LCA Review included a desk based study of Inherent Sensitivity. Inherent Sensitivity is 'based upon the assumption that a landscape with a clearly defined and strongly unified character will be more sensitive to change by virtue of the fact that such landscapes are less able to accommodate 'alien' features that do not conform to the existing pattern', and therefore could provide support, for example, for a decision to scope out potential allocation sites. Desk based visual sensitivity data is also available, however a cautionary approach should be used in interpreting the visual sensitivity data provided in the Review, as the assessment did not consider particular development types, size or the specific nature and constraints of land cover parcels. To be robust, the Authority would therefore be advised to consider commissioning area or site specific Landscape Sensitivity Studies to assess potential sensitivity of specific sites to specified development types. Policies should be informed by the Landscape Character Assessment and seek to conserve and enhance the character of the landscape. In the case of Cannock Chase AONB, the Countryside and Rights of Way Act (2000) requires that Planning Authorities have regard to the purpose of conservation and enhancement of the landscape and scenic beauty of AONBs. This is supported by Revised National Planning Policy Framework (NPPF) July 2018, which in Paragraph 172 requires that "Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues." In response, the Local Plan needs to incorporate robust policy to deliver an appropriate level of conservation and enhancement of the AONB. Policy should seek to conserve and enhance the AONB and should refer to supporting delivery the objectives of the Cannock Chase AONB Management Plan. Further detail and in the form of an SPD that sets out design expectations for proposed development that may impact on the AONB and its setting, would be welcomed. Possible allocation of sites where development might affect Cannock Chase AONB and its setting will also need to be mindful of the requirements of the NPPF. Whether a proposal is 'major development' remains a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined. The Authority could consider defining 'major development' in relation to potential impacts on the AONB and its setting, with reference to different scales and types of development. If required, possible allocation of sites where development might affect Cannock Chase AONB and its setting could be scoped out, supported by LCA evidence and the Inherent Sensitivity study data; however to be robust, where development would potentially impact on the AONB or its setting the Authority would be advised to consider commissioning area or site specific Landscape Sensitivity Studies to assess potential sensitivity of specified development types.
53	Wardell Armstrong on behalf of Dean Lewis Estates	Development that is within or affects designations such as Green Belt, SSSI or AONB or other constraining designations should be avoided where possible, or strictly controlled. Opportunities to exploit major brownfield development opportunities at locations that are or can be made sustainable as a direct consequence of the development should be strongly supported in policy terms. The major brownfield development opportunity at Cold Meece is not constrained by any landscape designations nor any environmental designations. It is visually well contained and provides an excellent opportunity to deliver development that enhances the Borough's sustainability objectives.
54	Lefroy, J. MP	The Borough should again list in as much detail as possible all the landscapes and key features which are beautiful, significant, historic or remarkable in any way. It should then be a principle that these landscapes cannot be altered/affected without very good reason. In London, for instance, there are certain protected views which influence the siting, height and extent of new buildings.
66	Natural England	Natural England looks forward to working with the Council on relevant policy aspects of the local plan review taking account of the opportunities presented by means of the revised NPPF.

Question 28: What approach should the Local Plan take to ensure that Borough's natural assets are protected and where possible enhanced?

Response Reference	Full name of respondent	Comments
23	Eccleshall Parish Council	The new Local Plan should continue in line with current SBC policies. Any proposed development close to these sites could be subject to a contribution towards the enhancement of such sites.
36	Ingestre with Tixall Parish Council	Local Wildlife Sites, e.g. Lion Lodge Historic Saltmarsh should be supported and promoted.
40	Woodland Trust	We would like your new plan to replicate the very strong protection given to ancient woodland and ancient/veteran trees in part 1 of your current local plan. This is particularly important as these habitats are irreplaceable and hence need the highest possible level of protection in planning policy. This has been recognised by Government in the new revised NPPF which has recently been published. Para 175 of the new NPPF states that ancient woodland and ancient/veteran trees should only be lost to development in wholly exceptional circumstances.
42	Jackson, J.	Previously, assessments for developments/planning applications simply concentrate on "designated areas" with little regard for existing habitats elsewhere without some sort of "official status." However, areas that are recognised as special and requiring protection, often stems from earlier developments destroying such sites.
44	Colwich Parish Council	There should be a review of the Borough's natural assets. There should be no development on these assets (they should be ring fenced). For any development there should be formidable mitigation. Greater use should be made of Green Infrastructure Plans which are found in Local Neighbourhood Plans.
46	Stephen Locke Associates on behalf of landowners	Large scale development sites should be supported by an environmental and biodiversity assessments where necessary and also have the potential to provide habitat gains, such as new woodlands, water bodies, wildlife corridors and habitats. As previously mentioned, the guidance in the new NPPF (2018) should be considered.
49	Staffordshire County Council	Ecology The Local Plan should provide for: <ul style="list-style-type: none"> • Protection and enhancement of existing sites, habitats and species • Creation of ecological networks and stepping stone habitats (NPPF, 174) • A strategy for the water environment (see also comments under question 30) • Measurable net gain for biodiversity, preferably by specifying a standard for percentage gain, such as Lichfield has adopted (20% net gain). Without a stated standard, developers will tend to bring forward proposals with a very small net gain (usually less than 1%). Net gain should be measured using a published metric, such as that used in Warwickshire; there are plans to develop a Staffordshire version.) • NPPF (2018) 175(c) makes clear that irreplaceable habitats should be given special consideration in the planning system, with ancient woodland and veteran trees cited as examples. Stafford Borough does have veteran trees outside ancient woodlands, which will need specific consideration as isolated veteran trees are often vulnerable. • Site allocation <ul style="list-style-type: none"> o At least a basic assessment for any likely biodiversity issues, including habitats, protected and key species should be undertaken on any sites likely to be allocated for development. This is because any constraints need to be identified early and may reduce the area of developable land within a site. NPPF makes clear that the first priority is to avoid harm (avoid, mitigate compensate hierarchy.) In some cases the basic assessment might only involve confirming existing information, and in other areas such as ploughed land aerial photographs may provide sufficient information. o Where owners / developers are bringing forward land for inclusion the onus might be on them to provide this information in the form of a Preliminary Ecological Appraisal (PEA.) If this is the case it is important to note (and make clear to the developer) that this work will likely have to be re-done at development stage because surveys such as PEA are only valid for two years. • Evidence base - existing evidence derived from Staffordshire Ecological Record may need to be supplemented with further survey work e.g. potentially an Extended Phase 1 Biodiversity Study of key areas. This would provide vital evidence for a strategic approach (see also question 31). I would welcome the opportunity to be involved in devising this study.
54	Lefroy, J. MP	Again the Local Plan should seek to list the natural assets which should be protected and enhanced so that any impact on them by a proposed development can be fully taken into account.
66	Natural England	Natural England looks forward to working with the Council on relevant policy aspects of the local plan review taking account of the opportunities presented by means of the revised NPPF.

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?

Response Reference	Full name of respondent	Comments
3	Bramall, S.	No

Response Reference	Full name of respondent	Comments
23	Eccleshall Parish Council	No – there is an effective policy in place.
37	Knights on behalf of Birch House Lane Industrial Estate	No objections to a Green Belt review. Notwithstanding this, rural sites outside of the Green Belt should be considered preferable to Green Belt release in terms of their potential to deliver economic and residential development. Our client's site at Birch House Industrial Estate is located within the rural area and has the potential to contribute to future economic and/or housing needs in the rural area.
42	Jackson, J.	No; otherwise Staffordshire will just become another West Midlands-style conurbation.
44	Colwich Parish Council	No review is necessary.
46	Stephen Locke Associates on behalf of landowners	We support the protection of Green Belt where possible but accept there may be exceptions where very special circumstances dictate that Green Belt policy be outweighed by other considerations. Given the size of the Borough and potential for development outside Green Belt, it is felt that relaxation of Green Belt boundaries are not required at this stage.
48	GVA on behalf of St Philips	Land should only be released from the Green Belt in the event that other Brownfield or non-Green Belt land is not available. In this respect, the land at Castle Street is comprised solely of Greenfield land and demonstrates a sustainable opportunity adjacent to the settlement boundary of Eccleshall to accommodate the future growth of the Borough without the need to release additional Green Belt land.
51	Wardell Armstrong on behalf of Barratt Homes and David Wilson Homes Mercia	The NPPF states that "Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans". It does not state that a review should not take place. While a Green Belt review is likely to provide information as part of the evidence base for the Local plan review, it should not be forgotten that there are a number of sites outside the Green belt that can make a helpful contribution to the Borough's housing need, not least around Stone, where significant future economic activity is planned.
52	GVA on behalf of Taylor Wimpey	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.
53	Wardell Armstrong on behalf of Dean Lewis Estates	It is not apparent that exceptional circumstances exist to review the Green Belt. Even if such circumstances do emerge having regard to the need to meet the housing and employment growth needs of the borough, then the local plan must enshrine a principle that the major brownfield suitable development opportunities should be prioritised over against the release of Green Belt The major brownfield development opportunity at Cold Meece would assist the council in this regard in that it fully meets NPPF Para 117 in terms of making as much use as possible of previously used land.
54	Lefroy, J. MP	Yes, a review is urgently needed and a new area of Green Belt between Stafford and Stone is required as stated above,
57	Pegasus Group on behalf of Richborough Estates, Gnosall	Whilst less than a quarter of the Borough area may be identified as falling within the Green Belt, the Scoping the Issues Report correctly identifies a number of other European and World level constraints that exist within the Borough, including: <ul style="list-style-type: none"> • Cannock Chase Special Area of Conservation (SAC) • Chartley Moss SAC (under the West Midlands Meres and Mosses SAC) • Pasturefields Salt Marsh SAC • Cop Mere (under Midland Meres and Mosses Phase II Ramsar designation) • Aqualate Mere (under Midland Meres and Mosses Phase II Ramsar designation) • Motte Meadows SAC (on the edge of the Borough) There are therefore clearly a number of other constraints to development within the Borough, other than the Green Belt. Furthermore, the above constraints are statutory (legal) designations, in contrast to Green Belt, which is a 'policy-on' designation. As such, these designations benefit from a higher level of protection than the Green Belt. As such, should it transpire that insufficient suitable sites are identified as being available for development in sustainable locations, it may be necessary to turn to sustainable locations within the Green Belt in order to meet any outstanding housing or employment need. It would therefore be prudent for the Local Authority to have an up to date evidence base in respect of the Green Belt, to allow the Authority to make the most appropriate decision regarding the spatial strategy, regardless of whether or not it is determined that exceptional circumstances exist to justify the release of Green Belt land.
58	Pegasus Group on behalf of Richborough Estates, Weston	Whilst less than a quarter of the Borough area may be identified as falling within the Green Belt, the Scoping the Issues Report correctly identifies a number of other European and World level constraints that exist within the Borough, including: <ul style="list-style-type: none"> • Cannock Chase Special Area of Conservation (SAC) • Chartley Moss SAC (under the West Midlands Meres and Mosses SAC) • Pasturefields Salt Marsh SAC • Cop Mere (under Midland Meres and Mosses Phase II Ramsar designation) • Aqualate Mere (under Midland Meres and Mosses Phase II Ramsar designation) • Motte Meadows SAC (on the edge of the Borough) There are therefore clearly a number of other constraints to development within the Borough, other than the Green Belt. Furthermore, the above constraints are

Response Reference	Full name of respondent	Comments
		<p>statutory (legal) designations, in contrast to Green Belt, which is a 'policy-on' designation. As such, these designations benefit from a higher level of protection than the Green Belt.</p> <p>As such, should it transpire that insufficient suitable sites are identified as being available for development in sustainable locations, it may be necessary to turn to sustainable locations within the Green Belt in order to meet any outstanding housing or employment need. It would therefore be prudent for the Local Authority to have an up to date evidence base in respect of the Green Belt, to allow the Authority to make the most appropriate decision regarding the spatial strategy, regardless of whether or not it is determined that exceptional circumstances exist to justify the release of Green Belt land.</p>
59	Pegasus Group on behalf of Richborough Estates, Stone	<p>Whist less than a quarter of the Borough area may be identified as falling within the Green Belt, the Scoping the Issues Report correctly identifies a number of other European and World level constraints that exist within the Borough, including:</p> <ul style="list-style-type: none"> • Cannock Chase Special Area of Conservation (SAC) • Chartley Moss SAC (under the West Midlands Meres and Mosses SAC) • Pasturefields Salt Marsh SAC • Cop Mere (under Midland Meres and Mosses Phase II Ramsar designation) • Aqualate Mere (under Midland Meres and Mosses Phase II Ramsar designation) • Motte Meadows SAC (on the edge of the Borough) <p>There are therefore clearly a number of other constraints to development within the Borough, other than the Green Belt. Furthermore, the above constraints are statutory (legal) designations, in contrast to Green Belt, which is a 'policy-on' designation. As such, these designations benefit from a higher level of protection than the Green Belt.</p> <p>As such, should it transpire that insufficient suitable sites are identified as being available for development in sustainable locations, it may be necessary to turn to sustainable locations within the Green Belt in order to meet any outstanding housing or employment need. It would therefore be prudent for the Local Authority to have an up to date evidence base in respect of the Green Belt, to allow the Authority to make the most appropriate decision regarding the spatial strategy, regardless of whether or not it is determined that exceptional circumstances exist to justify the release of Green Belt land.</p>
62	Knights on behalf of Jonathan Lloyd Developments Ltd	No objections to a Green Belt review. Notwithstanding this, rural sites outside of the Green Belt should be considered preferable to Green Belt release in terms of their potential to deliver economic and residential development. Our client's land at Hixon Airfield is located within the rural area and has the potential to make a significant contribution to future economic and/or housing needs in the rural area without affecting the Green Belt - and would in turn reduce the pressure for growth in areas that would affect the Green Belt.
65	Hinson Parry & Company	Paragraph 137 of the NPPF (2018) sets out clear criteria for when a Green Belt review may be necessary. To determine whether such a review is required, the council should work through those steps and publish their conclusions for consultation.
67	Hopton and Coton Parish Council	Review is always required even if to confirm that the status quo should be maintained.

Question 30: Which renewable technologies do you think are most suitable for development in the Borough? Please provide additional information as to why you deem these to be suitable.

Response Reference	Full name of respondent	Comments
3	Bramall, S.	Solar is Ok as doesn't spoil the skyline. NO to wind turbines
23	Eccleshall Parish Council	John mentions solar, which may not be unsightly if properly planned, and all new buildings including houses should have some solar panels included.
28	Banham, D.	<p>New build housing should incorporate grey water systems.</p> <p>New housing needs to have a better (lower cost, easier to handle by the household and refuse contractors, and not be unsightly) refuse system for all categories of waste. The multiple wheely bin system is less than ideal. (Especially for pre-existing housing stock with no space to keep the bins.) Designing-in community bins, serving many house-holds, to new estates may provide a better solution for bulk storage awaiting collection than requiring each household to manage multiple wheely bins. (My house has 4 such bins; 2x recycling, 1x general, 1x garden).</p> <p>The transition to bright white street lighting over the last decade needs to be reviewed. Recent studies have shown that the blue light content of this white light is causing harm to both animals and people. Moreover, the blue light content resets the eye's dark adaptation in an instant and this causes problems when moving from a well lit "light pools" to areas only served by scattered light. (You can note the difference in light level perception when walking (or driving) around estates illuminated in white light and those illuminated by low pressure sodium light with its predominant red light content.) Note that LED lighting can be made with pretty much any spectral content and does not just have to have a broad-band, white light, output.</p> <p>In support of electric cars, new housing should incorporate fast charging technology. A consequence of this is that a 3-phase electrical supply will be needed for each property and the new estates electrical supply network needs to be capable of fast charging an estates worth of cars simultaneously (or having the means to coordinate the charge connection points to stagger their demand to met a target time for the connected car to be ready for its next intended use (such as in an overnight charging scenario)). The means of providing such car charging facilities retrospectively to the exiting housing stock, and especially to those areas that</p>

Response Reference	Full name of respondent	Comments
		only have on-road car parking, also needs consideration. Consider how on-road parked cars will be charged with trailing cables from the owners property to their car that may not even be parked directly outside their property. [Consideration should also be given as to whether hydrogen power cars will succeed, since it avoids the electrical infrastructure issues noted here and replaces that with the need for hydrogen filling stations.]
36	Ingestre with Tixall Parish Council	More solar farms and wind turbines should be built at suitable sites and there is a need for more electric recharging points in the area.
40	Woodland Trust	We would like your Local Plan to consider the various ways in which trees and woods can contribute to alleviation of climate change: both in mitigation and in adaptation. Trees can absorb CO2 and hence mitigate against climate change and wood can be an environmentally sustainable source of fuel. They can also facilitate adaptation in a variety of ways, including alleviation of surface water flooding by reducing the rate at which rainwater gets into the drainage system. For further information this please refer to: https://www.woodlandtrust.org.uk/publications/2014/05/stemming-the-flow . Trees can also help in adaptation by providing shading and helping to combat the urban heat island effect.
44	Colwich Parish Council	Solar and wind power should be encouraged. The Borough has many suitable locations for wind generation. Water generation by water pumps should also be encouraged as the Borough has a lot of water courses such as rivers and canal weirs.
46	Stephen Locke Associates on behalf of landowners	The Borough is best suited to technologies such as small-scale solar photo-voltaic panels, anaerobic digestion plants, ground source heat pumps, single wind turbines, biomass plants and the development of biofuels.
49	Staffordshire County Council	Ecology It is important that the Local Plan ensures protection of the water environment and new (NPPF, 165) and retrofitted SUDS, buffering waterside habitat and removal of artificial barriers such as weirs and culverts may all form part of a strategy for achieving this. These may also help with flood management (NPPF, 157c refers).
53	Wardell Armstrong on behalf of Dean Lewis Estates	The renewable energy technology and energy market is fast growing and dynamic market. The local plan should ensure a flexible approach to renewable technologies to allow for the constant improvements of products. The principle of energy consumption being as efficient as possible and drawn from sustainable sources where possible should be supported in policy provided it is realistic to do so.
54	Lefroy, J. MP	<ul style="list-style-type: none"> • Solar (photovoltaic and water heating), both as solar farms and as a requirement for new buildings. This is a technology which now requires little or no subsidy and can be used locally, reducing transmission losses. • There remains scope for wind turbines across the Borough. This is currently the lowest cost renewable energy and its efficiency is constantly improving. • Greater pressure on water supplies means that rainwater harvesting should be considered more widely. • Waste to energy/anaerobic digestion is suitable where it uses genuine waste. However food production should be given priority on good agricultural land over crops grown for energy. The UK's food self-sufficiency is below 60%.
66	Natural England	Natural England looks forward to working with the Council on relevant policy aspects of the local plan review taking account of the opportunities presented by means of the revised NPPF.
67	Hopton and Coton Parish Council	Water power and ground source power.

Question 31: This document sets out the issues that need to be addressed through the new Local Plan. There may be matters that have been missed or that are not covered by the other consultation questions. Are there any matters you think also need to be considered at this stage and why?

Response Reference	Full name of respondent	Comments
3	Bramall, S.	You have not addressed equality and diversity – I believe a public body has a duty to do this. This would highlight the issues such as: - Bungalows/ housing for the elderly - Footpaths for wheelchairs, mobility scooters and prams.
4	Historic England	We would add that cross-subject thinking with regard to the historic environment will be a beneficial exercise, to establish inter-relationships which should be considered. Page 4 of our document 'The Historic Environment in Local Plans' provides a useful set of considerations in this regard.
18	Tetlow King Planning	Affordable housing in perpetuity Government guidance states that affordable housing may be secured for future eligible households, however the requirement for affordable housing to be retained in perpetuity in planning policies is only raised in relation to housing delivered on rural exception sites. The term has a clear legal meaning which is recognised within the new NPPF (2018). This principle is appropriate and supported by our members on rural exception sites as this helps to secure land for delivery of affordable housing in rural areas where housing delivery would otherwise not be supported. Securing affordable housing in perpetuity more widely is not supported for a number of reasons, foremost of which is that it restricts lenders' appetite to fund development, as mortgage provision becomes more difficult with greater restrictions on individual properties. Private companies will not typically invest in

Response Reference	Full name of respondent	Comments
		<p>developments if there is no prospect of realising the original investment and any returns. As the availability of public grant funding has been significantly restricted in recent years, the ability of Registered Providers to obtain private finance for the development of new affordable housing should not be further restricted by unnecessary Section 106 clauses.</p> <p>As well as restricting future ability to recycle housing stock where necessary to respond to local circumstances, and when used in a rigid fashion also prevents tenants from being able to staircase to full home ownership in intermediate affordable housing. This latter point is particularly critical as inability to staircase to full home ownership depresses interest in such housing, as potential purchasers look instead to Help to Buy products. This is unhelpful as it restricts Registered Providers' ability to fund development over the long term; as receipts from the sales of shared ownership properties are funnelled directly back into delivering more affordable housing it is perverse to prevent staircasing. We ask that the Council reconsider this approach and look to other mechanisms where necessary, allowing Registered Providers to recycle public subsidy to reinvest in new stock. Securing affordable housing through conditions and Section 106 Agreements can be achieved without further restricting development potential.</p> <p>We have enclosed a Proposed Standard Mortgagee Exclusion Clause wording for your information.</p>
42	Jackson, J.	Existing rural communities should be protected from overdevelopment.
43	Chartley Parish Council	Question 31 might consider the effects of the internet, self drive cars, electric vehicles and Brexit for instance.
44	Colwich Parish Council	The negative impact of HS2 on the environment and the local infrastructure should be considered. The disruption to businesses during the construction period should also be considered.
46	Stephen Locke Associates on behalf of landowners	<p>We broadly agree with the Council's aims to create successful places and to facilitate the delivery of high quality, sustainable and well-located development supported by the timely provision of infrastructure.</p> <p>As highlighted above, we wish to promote the expansion of the market town of Stone and appreciate that it needs to be developed in a collaborative way with local communities and local stakeholders to provide long-term benefits for all.</p> <p>The land to the south-west of Stone can be delivered in a timely way and will provide a major sustainable allocation for housing, employment and community infrastructure growth which will alleviate development pressures in other areas of the Borough.</p>
47	Inland Waterways Association	<p>The Plan For Stafford Borough includes Policy E7 Canal Facilities and New Marinas, with supporting text at 9.29, and IWA expects that this policy will be carried forward into the new plan.</p> <p>IWA is generally content with the provision this makes for canal related developments and facilities, and with the description of the Shrewsbury & Newport and the Stafford Riverway Link projects, although a more explicit expression of support for these waterways restoration projects would be welcome.</p> <p>However, we consider that the following condition should be removed from the policy:</p> <p>h. There are no permanent moorings for residential use.</p> <p>It is normal practice nowadays for canal boat marinas to include a proportion of residential berths. Not only does this provide for the increasing numbers of people choosing to live on canal boats, but their presence contributes greatly to the security of the whole site. If sufficient numbers of properly serviced berths are not provided in marinas or at other mooring locations through the planning system where they can be subject to appropriate controls, then residential boaters will have no choice but to moor in other locations along the canal system which may have greater visual impact on the countryside. Such unofficial residential moorings are also less likely to contribute to Council Tax. An appropriate percentage of residential berths for individual sites will vary according to local circumstances but up to 10% is generally a reasonable expectation.</p>
49	Staffordshire County Council	<p>Ecology</p> <p>In relation to Ecological networks and opportunity mapping the NPPF makes several references to ecological networks including at paragraph 171:</p> <p>171. Plans should:... ..take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries</p> <p>The most recent county strategy for biodiversity is the Staffordshire Biodiversity Action Plan (BAP)(3" edition, 2001) which is probably at too broad a scale and rather out of date, although could provide a starting point (http://sbap.org.uk/actionplan/index.php). Further work is needed to devise a detailed strategy for the Borough, ideally in cooperation with neighbouring districts, and by using ecological modelling methods. Staffordshire Ecological Record holds suitable data and expertise for this process, although further survey work may be needed.</p> <p>It is probable that timescales will not allow for a network / opportunity strategy to be developed within the Local Plan timescale. It would be helpful if a Policy were incorporated that recognises that a strategy will emerge during the plan period.</p>
53	Wardell Armstrong on behalf of Dean Lewis Estates	<p>It is of fundamental importance that the 'Developing a Vision & Objectives' together with the related settlement Assessment Proforma embrace the possibility pursuing major brownfield development opportunities that do not directly accord with historic settlement hierarchy that has restricted growth to incremental development within or on the edge of those settlements.</p> <p>The spatial planning of the Borough must have regard to such opportunities. The council must devise a policy framework that can accommodate sustainable growth in these locations.</p> <p>It is also therefore essential the Sustainability Assessment Methodology is also formulated to enable appropriate testing of the benefits of such proposals that do not conform the historic approach taken in respect of the location of growth as set out within the adopted PSB1.</p> <p>The information produced by JAM Consult on behalf of Dean Lewis Estates provides our position on this specific and important matter.</p>

Response Reference	Full name of respondent	Comments
		Dean Lewis Estates objective is to work collaboratively with Stafford Borough to ensure the 'presumption in favour of sustainable development' can be achieved within a policy context for the major brownfield development opportunity at Cold Meece. We firmly believe that, in the context of an appropriate supportive local plan policy approach, the sustainable development of Cold Meece will effect a real change and restore the balance between social, economic and environmental needs for this part of the Borough.
54	Lefroy, J. MP	a) It is vital that the Borough looks at new and imaginative ways to promote housing development. At the moment, developments are being driven by large developers marketing their land. However, some smaller landowners, who may have land in more convenient places for development, are being side lined or scared off by the larger developers, often because their land holding is too small or they don't have the overheads to go through the marketing themselves. Although finances are tight, I would like the Borough Council to consider how they could either purchase or broker land that could be used for housing and/or employment and then develop it for the needs of the Borough, not the developer. Profits could be ploughed back into the Council and some Council housing could be considered. b) The Borough should consider much more joint working across Staffordshire to deliver services efficiently. I do not believe that a unitary council is necessarily the way forward as this would reduce local accountability. However the idea of a 'virtual unitary' with much greater cooperation between Boroughs/Districts, the County and the City of Stoke-on-Trent seems to me a sensible way forward. The savings made could be reinvested in services to the public. c) As mentioned in specific answers, I am very concerned about the erosion of public transport, particularly in rural and suburban areas. The Borough should consider a substantially larger community transport scheme, in cooperation with other Districts and the County.
66	Natural England	Strategic and cross boundary issues: NB Air quality – Wealden judgement and assessment of 'in combination' effects. Consideration will need to involve dialogue with neighbouring LPAs in respect of plans and projects which in combination may have significant effects on European Sites in the area. Scope may exist to explore the need for and application of Shared Nitrogen Action Plans (SNAPs). Atmospheric nitrogen 'theme plan' link: https://www.google.com/url?q=http://publications.naturalengland.org.uk/file/5688662740172800&sa=U&ved=0ahUKEwicxaP4tsvbAhUBkCwKHb9BCnkQFggGMAE&client=internal-uds-cse&cx=016466427749889765075:9dnxorwiphg&usg=AOvVaw3BivBMiut8UxMTdJ8r8DcP
67	Hopton and Coton Parish Council	No.

General Responses

Response Reference	Full name of respondent	Comments
1	Gnosall Parish Council	Paragraph 1.12: Mentions NPs as part of the existing PfSB and therefore part of the statutory development plan until new plan adopted. Paragraph 2.6: SBC CBP ought to mention hospital provision in its aim of providing a safe place to live. Paragraph 3.7: Draft NPPF could be perceived as a threat. It states that plans should identify opportunities for villages to grow and thrive, especially where this will support local services. Developers have advanced that argument before, framing development as an opportunity to support existing business Paragraph 3.8: Does this need to change in light of NPPF in favour of small builds? Paragraph 3.14: But developers have little interest in building anything other than executive homes. Profit before need.
2	Marine Management Organisation	The Marine Management Organisation (MMO) is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing European grants. Marine Licensing Activities taking place below the mean high water mark may require a marine licence in accordance with the Marine and Coastal Access Act (MCAA) 2009. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in England and parts of Wales. The MMO is also the authority responsible for processing and determining harbour orders in England, and for some ports in Wales, and for granting consent under various local Acts and orders regarding harbours. A wildlife licence is also required for activities that that would affect a UK or European protected marine species. Marine Planning As the marine planning authority for England the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas. On 2 April 2014 the East Inshore and Offshore marine plans were published, becoming a material consideration for public authorities with decision making functions. The East Inshore and East Offshore Marine Plans cover the coast and

Response Reference	Full name of respondent	Comments
		<p>seas from Flamborough Head to Felixstowe. For further information on how to apply the East Inshore and Offshore Plans please visit our Marine Information System. The MMO is currently in the process of developing marine plans for the South Inshore and Offshore Plan Areas and has a requirement to develop plans for the remaining 7 marine plan areas by 2021.</p> <p>Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. For marine and coastal areas where a marine plan is not currently in place, we advise local authorities to refer to the Marine Policy Statement for guidance on any planning activity that includes a section of coastline or tidal river. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act and the UK Marine Policy Statement unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our online guidance and the Planning Advisory Service soundness self-assessment checklist.</p> <p>Minerals and waste plans and local aggregate assessments</p> <p>If you are consulting on a mineral/waste plan or local aggregate assessment, the MMO recommend reference to marine aggregates is included and reference to be made to the documents below:</p> <ul style="list-style-type: none"> • The Marine Policy Statement (MPS), section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK) construction industry. • The National Planning Policy Framework (NPPF) which sets out policies for national (England) construction minerals supply. • The Managed Aggregate Supply System (MASS) which includes specific references to the role of marine aggregates in the wider portfolio of supply. • The National and regional guidelines for aggregates provision in England 2005-2020 predict likely aggregate demand over this period including marine supply. <p>The NPPF informed MASS guidance requires local mineral planning authorities to prepare Local Aggregate Assessments, these assessments have to consider the opportunities and constraints of all mineral supplies into their planning regions – including marine. This means that even land-locked counties, may have to consider the role that marine sourced supplies (delivered by rail or river) play – particularly where land based resources are becoming increasingly constrained.</p>
4	Historic England	<p>Broad advice: Stafford's new Local Plan will be expected to include a proper description, identification and assessment of the historic environment, based upon a robust evidence base regarding heritage information. The plan will need to demonstrate how it conserves or enhances the historic environment of the area and how the presumption in favour of sustainable development should be applied locally. This includes ensuring that the sites which it is proposing to put forward for development, will assist in delivering such a strategy.</p> <p>We advise that the following advice documents are used to develop the Local Plan from the early stages;</p> <ul style="list-style-type: none"> • The Historic Environment in Local Plans: https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/ • The Historic Environment and Site Allocations in Local Plans: https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/ • Sustainability Appraisal and Strategic Environmental Assessment: https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/ • Decision-taking in the Historic Environment: https://historicengland.org.uk/advice/planning/decision-taking/ • The Setting of Heritage Assets: https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/
5	GL Hearn on behalf of Severn Trent Water	<p>Submission on behalf of Severn Trent Water – Land at Gnosall Heath</p> <p>GL Hearn acts on behalf of Severn Trent Water ('STW') in relation to its land interests within the Stafford area and has been instructed by STW to submit a response to the ongoing Local Plan Reg 18 Issues consultation. This Representation comes following our submission to the 'call for sites' earlier in the year. STW is a regulated utility company with statutory responsibilities for the provision of water and sewerage services across the English Midlands and Central Wales. As a result of changing processes in relation to clean water provision and wastewater treatment, significant areas of land are no longer required by the business for operational purposes and as such are surplus to requirements. STW is currently undertaking a programme of rationalising its land holdings and is seeking to dispose of redundant operational assets for alternative uses through a process of Irrevocable Sign Off (ISO). Proceeds from the asset disposal are reinvested back into the core business to improve services for its customers.</p> <p>Land at Gnosall Heath:</p> <p>Please find enclosed the completed form and site plan associated with Severn Trent Water's surplus land holding at Gnosall Heath. The site, approximately 0.8ha to the north of Gnosall Heath, forms part of an old sewage treatment works and adjoins an active pumping station to the east- which will remain operational. To the north of the site are a series of functioning allotments, and to the south, a publicly accessed, dis-used stretch of the National Route 55 railway line, which separates the site from a number of large detached/semi-detached residential dwellings.</p> <p>At this stage, we would welcome the site to be considered as part of the ongoing review of the Council's Local Plan, and meet with the Council, to discuss the development opportunity that the site may be able to provide, in terms of contributing, and delivering a number of residential and/or employment units for the area.</p>
13	Sport England	<p>General - Sport England welcome that the authority are updating its evidence base relating to playing pitches, built and indoor facilities in line with NPPF paragraph 96. Whilst the level of growth to be planned for in the Local Plan is not certain at this point in time the final evidence base document should be aligned. Para 3.34 – to achieve an environment that encourages activity in our daily lives it is considered that the emerging plan should contain policies that reference</p>

Response Reference	Full name of respondent	Comments
		Active Design. Active Design (October 2015), produced by Sport England in conjunction with Public Health England, is a guide to planning new developments that creates the right environment to help people get more active, more often in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design. The document can be downloaded via the following link: http://www.sportengland.org/activedesign
14	National Grid	National Grid has appointed Wood to review and respond to development plan consultations on its behalf. We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.
29	Cannock Chase Council	<p>Our Councils meet regularly on a range of planning policy matters under the Duty to Co-operate. From the most recent meeting (held on 23rd July 2018) it was agreed that our existing evidence shows that Stafford Borough and Cannock Chase District have different housing market areas and economic geographies, and work together primarily on environmental matters in particular the Cannock Chase Area of Outstanding Natural Beauty and the Cannock Chase Special Area of Conservation (SAC) and their associated partnerships and shared evidence base and shared approach to mitigation and cumulative impacts where this is required by the Habitats Regulations.</p> <p>There are a number of areas in the consultation document which will need updating as the consultation was launched prior to the Government publishing the new National Planning Policy Framework, so clearly work on the next stage of the plan will need to have regard to this. Cannock Chase Council welcomes the brownfield first approach and will need to follow the approach set out in the new NPPF should it be unable to accommodate all of its growth requirements on brownfield sites, to ensure that it can achieve its growth ambitions within its own boundaries and without negatively impacting upon environmentally sensitive areas such as the AONB and SAC. Furthermore, once more information is available it will be essential that infrastructure is carefully planned for, this includes transport matters. As such, infrastructure provision, funding and delivery will need to be considered within a wider strategic context under the Duty to Co-operate. Given that national planning policy is currently undergoing great change, and that further information is not yet available at the local level, it is important that our two Councils keep a regular and constructive dialogue going, as we both update our evidence and move forward to shape the next iterations of our Local Plans.</p>
30	Sustainability Matters in Stafford Borough	<p>I am writing on behalf of our group to ask whether representatives could meet with you to discuss to what extent, and how, local authority house-building policies and practices can fully address the scale of the ecological crisis which we currently face.</p> <ul style="list-style-type: none"> - As you will know, we see the consequences of accelerating anthropogenic global warming as increasingly catastrophic, and we think that all of us – including national government, local authorities, builders and house-dwellers – should make our first priority the protection of our planet home from further warming. - The same applies to other dimensions of the ecological crisis, including rapid biodiversity loss, which is an equal threat to the wellbeing of all living things, including our own species. A key example is the catastrophic decline in bee populations in recent years. - We feel that in one sense, all new house-building is of itself unsustainable. It requires huge investments of energy and materials, and obliterates acre after acre of living soil, along with the wider ecosystems of which the soil forms a crucial part. The main emphasis should be on transforming our lifestyles and making full use of existing housing stock, a substantial proportion of which is at any one time unused. - If we are however driven to allow some house-building, standards should clearly reflect the size of the ecological problems we face. The same applies to the building of supporting infrastructure such as transport links and leisure facilities. The use of brownfield sites should be top priority. Affordable housing on smaller plots should be given precedence over executive houses which use up so much more land and other resources. <p>We would very much like to discuss what a local authority such as Stafford Borough Council can and should be doing on each of these four points. Some specific issues might be:</p> <ul style="list-style-type: none"> a. Alternatives to new build What can planners do to make the best possible use of existing housing stock and to incorporate sustainability measures when non-residential buildings are converted into homes? b. Energy conservation and renewables <ul style="list-style-type: none"> i. What targets for the reduction of greenhouse emissions does SBC have, and how rigorously are they pursued? Can zero carbon emissions be the ultimate target? ii. Why are the highest standards not universally applied? The Bovis development at St Mary's Gate, for example, has only been given a 'B' energy rating, and the Church View development, built by Redrow, only received a 'C'. iii. The first tenet of 'passive' standard design is appropriate site orientation, but in none of the three developments on the Tixall Road which we have seen has this been addressed: the houses are not oriented to make the best use of the path of the sun. There is, similarly, no attempt to design 'active' houses, for example ones with heat exchangers and the capacity to use renewables to generate electricity. c. Transport <ul style="list-style-type: none"> i. What scope do you have to provide alternatives to car use and how determined are you to do so? ii. The assumption of planners and developers seems to be that the car still rules, whatever their paper commitment to such environmental imperatives as reducing greenhouse gas emissions and protecting biodiversity. The by-pass alongside the Tixall Road developments is a case in point. d. Leisure <ul style="list-style-type: none"> i. What scope does a local authority have to ensure that new developments incorporate significant leisure facilities which contribute to the necessary reductions in traffic and carbon emissions?

Response Reference	Full name of respondent	Comments
		<p>ii. Stafford has been losing spaces for public recreation over many decades – tennis courts, crown bowling greens, football and cricket grounds, and more.</p> <p>iii. Gardens, allotments and public green spaces are essential to the local production of food on the scale which is needed.</p> <p>iv. Community centres built into new developments are another ingredient of the process of localising the provision of goods and services which is at the heart of sustainability.</p> <p>e. Biodiversity</p> <p>i. What can Stafford Borough Council do to inspire and enforce much greater commitment by developers to the protection and enhancement of biodiversity?</p> <p>ii. A well- established and richly-varied hedgerow, for example, (containing perhaps most notably guelder rose) alongside the David Wilson Homes and Bovis developments at St Mary's Gate on the northern side of the Tixall Road was ripped out, making nonsense of claims that protection of biodiversity is a priority. Indeed, Bovis offers buyers a green wash 'Ecology information' leaflet which makes the ironic claim that bats, badgers, and birds (such as a little owl and lapwings) might be seen on site, at the same time as pointing out that for each group hedgerows (!) are a key source of food.</p>
31	Beardmore, C.	<p>The current plan for Stafford Borough between 2011-2031 states 70% of new development will be within or on the fringes of Stafford town. This approach I feel is inadequate, primarily due to the lack of transport infrastructure to cope with the increased demand. If these none linear developments were spread more evenly across small to medium size satellite villages with excellent transport links, it would not only alleviate some congestion within Stafford Town, it would also breathe new life into villages with aging populations. Two prime examples of the traffic issues due to the new developments within Stafford are along Beaconside and Blackheath Lane, both of these areas have shown a dramatic increase in congestion since the creation of, Marston Grange, St Mary's Gate and Church View. Both of these areas are close to recently constructed business developments, further traffic issues has the potential to deter new companies setting up within Stafford. I am strongly for the redevelopment of Brownfield sites within Stafford but the redistribution of fringe development across the small to medium size villages would have a greater positive impact on the local communities with introduction of new facilities and people which they desperately need. In addition to this, the village developments would free up more first time buyers houses as 2nd/ 3rd time established buyers would be drawn to the countryside.</p>
32	Environment Agency	<p>The Environment Agency has the following comments to make regarding issues relating to the water environment that need to be addressed within your Local Plan Review.</p> <p>Water Framework Directive</p> <p>A large part of the Environment Agency's work now is to implement the Water Framework Directive (WFD), a European Directive which aims to protect and improve the water environment. It applies to surface waters and groundwater.</p> <p>Successful implementation of the Water Framework Directive will help to protect all elements of the water cycle and enhance the quality of our groundwaters, rivers, lakes, estuaries and seas. We would expect therefore for WFD to be integrated into your Local Plan, and reflected in many of the policies your draft which relate to flooding, drainage, rivers, ecology and contaminated land.</p> <p>The Water Framework Directive (WFD) looks at the ecological health of surface water bodies (defined as a slight variation from undisturbed natural conditions), as well as achieving traditional chemical standards. In particular it will help deal with diffuse pollution which remains a big issue after we have improved most point source discharges.</p> <p>The Environment Agency has published River Basin Management Plans (RBMPs) that identify measures that will achieve WFD requirements for all water bodies in England and Wales. Regulation 17 of the Water Environment (WFD)(England & Wales) Regulations 2003 places a duty on each public body including local planning authorities to 'have regard to' RBMPs.</p> <p>When undertaking the development of a site, or the proposed development of a site, an assessment should be made to:</p> <ul style="list-style-type: none"> - identify when there might be impacts on water bodies; - seek options that reduce impacts on water bodies; - assess the risk of deterioration or failing to improve water bodies; - require all practicable mitigation; - prevent deterioration of current water body status; - take listed measures in RBMPs into account; - consider alternative development options that would avoid or reduce impacts on water bodies; - seek opportunities to improve water bodies; and - consider objectives in RBMPs for protected areas. <p>We recommend the following guidance, which provides advice on how Local Authorities can fulfill their duties in implementing this directive. Please pass on to any other colleagues you feel may benefit from this (including those outside planning). A list is included within the document stating which LPA roles may have a role to play with regards to this.</p> <p>http://www.sustainabilitywestmidlands.org.uk//media/resources/Final_Executive_Summ</p> <p>The RBMP most relevant to your Authority boundary is the Humber River Basin Management Plan which can be found here:</p> <p>https://www.gov.uk/government/collections/river-basin-management-plans-2015</p> <p>Rural areas to the west of the borough drain to the Severn however, and as such the Severn River Basin Management Plan should also be considered:</p> <p>https://www.gov.uk/government/collections/river-basin-management-plans-2015#severn-river-basin-district-rbmp:-2015</p>

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		<p>Rural areas in the far north of the borough drain to the north-west, and as such the North-West River Basin Management Plan should also be considered: https://www.gov.uk/government/collections/river-basin-management-plans-2015#north-west-river-basin-district-rbmp:-2015</p> <p>The following issues all fall under the banner of WFD-implementation in some way and should therefore be addressed within your policies and growth proposals.</p> <p>Foul Drainage</p> <p>Evidence supporting your Local Plan Review should demonstrate that the necessary foul drainage infrastructure is in place or viable for your allocated sites. Some areas may drain to the foul main sewer system to be treated by Severn Trent Water, but the transmission infrastructure or treatment facility may not be sufficient to handle the additional load created from growth and may in turn cause a pollution of the water environment.</p> <p>Conversely, where the main sewer is not available it must be ensured that the water environment has the ability to accommodate discharges from packaged treatment plants and other non-mains solutions.</p> <p>Where growth will be putting additional pressure on the Severn Trent Water foul mains, it must be demonstrated there will be no significant deterioration in current spill frequency/volume from storm related discharges (CSOs, storm tanks, pumping stations) as a result of any growth. This will require hydraulic modelling from Severn Trent Water (STWL) to demonstrate no risk of deterioration.</p> <p>The Environment Agency cannot make any statement on whether there is hydraulic capacity within a sewer network to accommodate the additional flow. Only STWL can do this. We can however advise on areas of concern with regards to 'permitted' capacity. In other words, sewage works that currently have headroom in their permits and acceptance of the additional flow would not trigger a permit alteration STWL should therefore be consulted on whether they have a preference for the location of the developments. If there are various parcels of land that could be developed then they may prefer certain areas draining to certain STWs or avoiding known pinch-points within a sewer network.</p> <p>At the point where we know where the growth is projected and which STWs it will drain to we can carry out a quick assessment to produce a RAG assessment of permitted capacity.</p> <p>Water Availability</p> <p>Evidence will also need to be provided to demonstrate that adequate water can be made available to support the level and distribution of growth proposed. Severn Trent Water are implementing various policies to reduce demand. These should be taken into consideration for any development in the area, especially the Building Regulations &c. (Amendment) Regulations 2015. We therefore recommend that any development considers water resource availability and implements water efficiency measures.</p> <p>Drought and non-drought events can put customer water supply at risk, these challenges combined with increased levels of development in the area should be considered as part of the whole in the assessment of whether a sustainable supply of water is available to support the plan.</p> <p>We recommend that in order to undertake the required assessment of these issues and provide suitable evidence to support your plan, the above issues relating to both foul drainage / water quality and water resources are addressed holistically in an integrated Water Cycle Study, which builds upon and updates your current study from 2010.</p> <p>River Channels</p> <p>Green/blue corridors provide multiple benefits to residential areas by providing services such as flood management provision, green space and ecological function and some amenity. Consequently they then need to be afforded a high level of protection (8m minimum standoff) from encroaching developments in order to facilitate their function particularly with the need for extra capacity due to climate change. This should be considered when assessing the capacity of sites that have a watercourse within or along the boundary.</p> <p>Deculverting of watercourses should be a standard policy primarily because it reduces flood risk and creates new ecological habitat. This will also allow more space to be freed up by for development because new development over culverts is not allowed and reduce future management implications of the culvert in the long-term. The new watercourse can be diverted to increase total length around the edge of developments which can provide extra flood event capacity and improve development layout.</p> <p>If greenspaces can be designed to be less formal areas with more semi-natural habitats this will reduce maintenance costs and provide better biodiversity and water management potential. Theses can also be incorporated into the surface water management of the site.</p> <p>Groundwater Protection</p> <p>Please note these comments relate solely to the protection of 'Controlled Waters', comments on the impact of contaminated land on human health should be directed to your Environmental Health team.</p> <p>Approximately fifty percent of the area covered by Stafford Borough Council is underlain by geological strata designated as Principle and Secondary Aquifers under the Environment Agency's 'Groundwater Protection: Principles and Practice' document. Several Source Protection Zones have been designated within the borough to protect Public Water Supply groundwater abstractions. Various watercourses cross the borough including the Rivers Trent and Sow.</p> <p>Groundwater in the underlying Principle and Secondary Aquifers and surface watercourses are 'Controlled Waters' and potential receptors of any land contamination which may be present within the borough. Therefore there is a need to give appropriate consideration to the protection of 'Controlled Waters' receptors during the development process. Such consideration is particularly required in relation to the redevelopment of brownfield sites where past activities may have caused land contamination but is also relevant when considering the future location of potentially polluting activities (e.g. the storage of fuels, oils and chemicals).</p>

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		<p>We note that Section 3.11 (Prioritising Brownfield Land) refers to over 160 brownfield sites that have been put forward within the Local Plan area for potential development. To address any issues associated with the redevelopment of brownfield sites, suitable site investigation and risk assessment will need to be undertaken in relation to 'Controlled Waters' receptors as recommended in planning policy guidance. Normally, this risk can be managed at planning application stage, however you should be aware when allocating sites that the degree of underlying contamination (and associated cost of remediation) may be a factor in the deliverability of allocated sites and as such it may be prudent in some cases to consider undertaking assessment of these risks at the strategic stage. Government Policy, as detailed in the National Planning Policy Framework (paragraph 120), states that 'where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner'.</p> <p>The plan proposals should be in line with the position statements in our 'Groundwater Protection: Principles and Practice' (GP3) document, available from our website at www.environment-agency.gov.uk. This document sets out our position on a wide range of activities and developments, including:</p> <ul style="list-style-type: none"> - Storage of pollutants and hazardous substances - Solid waste management - Discharge of liquid effluents into the ground (including site drainage) - Management of groundwater resources - Land contamination - Ground source heat pumps <p>It should be noted that certain high risk activities (e.g. underground and sub-water table storage of fuel) may not be appropriate within high risk areas such as Source Protection Zones.</p> <p>Flood Risk</p> <p>Flood risk is a key local issue as well as a cross-boundary issue and as such should be addressed by the inclusion of a specific flood risk policy to cover all sources of flooding, in addition to an up to date Level 1 Strategic Flood Risk Assessment (SFRA) and Level 2 SFRA where sites are allocated within the mapped floodplain to demonstrate that the site proposals can be delivered safely. Site allocations at risk of flooding should be supported by evidence to demonstrate that the Sequential Test and Exception Test have been passed. We recommend that funds are set aside at this early stage to commission consultants to undertake a detailed Level 2 SFRA if necessary.</p> <p>The Stafford BC area covers the River Trent and River Sow as well as a number of their tributaries which are all Main Rivers including Sandyford Brook, Rising Brook, Scotch Brook, Meece Brook, Doley Brook, and the River Penk. The main urban areas are at risk of flooding from rivers.</p> <p>There are currently around 1,700 residential and 1,120 non-residential properties at risk of flooding from rivers in the Stafford BC area with considerably more at risk from surface water flooding. This risk is likely to increase as a result of climate change. Parts of Stafford and communities along the River Trent are covered by the Environment Agency's flood warning service.</p> <p>Surface Water</p> <p>The Stafford Borough area has historically experienced a high number of flooding incidents caused by surface water. Staffordshire County Council, as Lead Local Flood Authority, should be consulted regarding surface water issues and suitable measures to deal with surface water arising from development proposals required to minimise the impact to and from new development. Staffordshire County Council has also published a SuDS Handbook which includes their requirements for managing surface water on new developments: https://www.staffordshire.gov.uk/environment/Flood-Risk-Management/Information-for-Planners-and-Developers.aspx</p> <p>Sow & Penk Internal Drainage Board (IDB) provide flood protection and water level management in the low lying areas of the River Sow and River Penk catchments in Staffordshire, Wolverhampton and Shropshire including a large area through Stafford itself. Although the IDB is not a statutory consultee on planning matters, developers are encouraged to contact them if their site falls within their boundary. Any works in, under, or near watercourses, or discharges of water into watercourses in the IDB area is likely to require consent from the IDB as well as planning permission.</p> <p>Flood Defences</p> <p>There are Environment Agency maintained flood defences in Stafford (River Sow, Sandyford Brook and Rising Brook), and at Aston Chase (Aston-by-Stone), Yarnfield and Standon. There are also flood storage areas at Aston Chase and Yarnfield.</p> <p>In order to ensure that the appropriate level of protection these defences provide is maintained in future, we need to ensure we can safely access these areas in order to inspect and carry out works. It is therefore important that any proposed development is set back at least 8 metres from any flood defence for this purpose. Consideration should be given to using CIL charging to contribute towards the costs of maintaining these defences for any new development that will benefit from the presence of the defences.</p> <p>It should be noted that even in defended areas there will always still be a degree of residual risk if these defences are overtopped or breached by a flood event greater than that for which the defences were designed. For this reason proposed development in areas benefitting from the presence of the defences will be required to incorporate raised floor levels.</p> <p>Investment programme</p> <p>There are a number of proposed schemes in our investment programme within the Stafford BC area which are all at different stages of assessment, appraisal and construction. Scheme costs and the amount of grant that schemes are eligible for can vary as they are developed. All proposed schemes are subject to economic</p>

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		<p>and environmental viability and to the availability of funding. A number of these schemes are unlikely to proceed unless contributions from beneficiaries or partner organisations can be identified and agreed.</p> <p>Please see Appendix 1 for details of schemes currently within our flood investment programme, and financial contributions required to bring these forward.</p> <p>Other flooding problems may arise in future which will require flood alleviation measures subject to technical, economic and environmental viability. Consideration should be given to using CIL charging to secure funding for flood risk schemes that are unlikely to be wholly funded through central or local government.</p> <p>Strategic Flood Risk Assessment</p> <p>The SFRA was originally produced in 2008 by Stafford Borough Council and was subsequently updated in 2014. Since then we have completed further hydraulic modelling at Stone, including Aston Chase and at Eccleshall (River Sow).</p> <p>Environment Agency has updated their guidance on how climate change could affect flood risk to new developments which was published on 19th February 2016 and came into immediate effect and these new climate change allowances should be used. More information can be found at the following link - https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances.</p> <p>The existing SFRA does not take account of the revised climate change guidance issued in 2016 as it has used an increase of 20% in peak flows to determine future flood risk. Given the strategic nature of Level 1 SFRA, we would now expect LPAs to consider as a minimum, the potential impacts from climate change under the central (20%), higher central (30%) and upper end (50%) allowances for the 2080s epoch to be included as part of the evidence base for the revised plan.</p> <p>In addition, other relevant documents published since 2014 such as the following should be taken into consideration as part of any SFRA review:</p> <ul style="list-style-type: none"> - Staffordshire Local Flood Risk Management Strategy 2015 https://www.staffordshire.gov.uk/environment/Flood-Risk-Management/Local-Flood-Risk-Management-Strategy.aspx - Staffordshire SuDS Handbook 2017 https://www.staffordshire.gov.uk/environment/Flood-Risk-Management/SuDS-Handbook.pdf - Humber Flood Risk Management Plan 2016 [Sub Area 'Staffordshire Trent Valley'] https://www.gov.uk/government/publications/humber-river-basin-district-flood-risk-management-plan <p>The SFRA (Level 1) should be used to apply the Sequential Test and assess all proposed site allocations to determine whether they are located outside of flood risk areas from all sources of flooding without the application of the Exception Test. It should include the definition of Flood Zone 3b to establish areas where water needs to flood or be stored in times of flood. The area identified as functional floodplain should take into account the effects of defences and other flood risk management infrastructure. If an area is intended to flood, e.g. an upstream flood storage area designed to protect communities further downstream, then this should be safeguarded from development and identified as functional floodplain, even though it might not flood very often.</p> <p>Appropriate policies should be included in the plan to ensure these areas are safeguarded for this purpose.</p> <p>If the Level 1 SFRA shows that land outside flood risk areas cannot accommodate all the required development, a Level 2 SFRA will be required in order to provide the information necessary for application of the Exception Test for those sites. This should include an assessment of the extent, duration, velocity, depth and rate of onset of flooding, as well as identification of affected properties, infrastructure and communities. It should also assess the risk of flood defences failing, for example could defences be breached or overtopped. The likelihood of flood defences failing will change over time, for example because of limitations on maintenance funding and/or degradation. You should also consider what would happen if the flood defences failed.</p> <p>We therefore advise that the SFRA (Level 1) should be updated to incorporate the latest climate change guidance as well as any other relevant issues and be used to apply the Sequential Test for proposed site allocations. It should also identify any cross-boundary flood risk.</p> <p>A SFRA (Level 2) will need to be produced to support application of the Exception Test where required, and demonstrate deliverability of the plan proposals.</p> <p>The conclusions of the SFRA Levels 1 and 2 should be reflected in the revised local plan.</p> <p>The current SFRA (2014) advises that a policy for flood risk management is essential in order to ensure a consistent approach and ensure that the objectives of national policy are embedded within the local plan. It also includes a number of policy recommendations for integration into the Local Plan.</p> <p>We recommended that the revised plan includes a specific policy on flood risk. Appendices 2 and 3 provides further details on this issues this should look to address.</p> <p>Regulated Sites</p> <p>The general issue of safeguarding regulated activity (such as AD plants, landfill, composting and other waste processing facilities) from proposed new sensitive receptors using a buffer zone is becoming an increasing concern. Issues can involve both housing development increasingly close to an operating waste facility, with inevitable complaints over amenity, with pressure on the Environment Agency (as the regulatory body) to act. This can result in pressure to demand that a facility closes and relocates, however a facility may be providing local or even national waste management capacity, identified in adopted waste plans.</p> <p>'Safeguarding' can also refer specifically to providing for appropriate future expansion of existing infrastructure, by preventing conflicting developments. We are seeing increasing pressure on waste facilities especially in urban areas, largely due to housing developments which result in an increase in complaints to ourselves as the regulator of those facilities. Changes to planning system now allow commercial properties to be converted to residential use, such as offices on industrial estates.</p> <p>It should be made clear that the Environmental Permitting Regulation does not demand 'zero impact', so conflict situations become inevitable.</p> <p>The updated NPPF now makes reference to placing obligations onto the "Agent of Change" (i.e. the developers/applicants,) requiring them to ensure appropriate</p>

Response Reference	Full name of respondent	Comments
		<p>mitigations are put in place to protect neighbouring users from impacts: 182. Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.</p> <p>As such, the Local Plan should look to identify issues where this may be an issue and consider carefully the allocation of sites which are located within close proximity to permitted waste facilities. Failure to do so can result in unacceptable levels of noise, odour, vibration, dust, smoke, flies, etc. Your local plan policies should identify these high risk facilities, steer development away from such areas and ensure that if development is proposed in close proximity it is such that it is not of a 'sensitive' nature to such nuisances. Close liaison with the waste planning authority and the Environment Agency should be maintained to ensure the plan reflects joined-up working.</p> <p>Waste Your plan should show how you have worked constructively alongside the Waste Planning Authority (WPA) to ensure waste management is considered alongside other spatial planning objectives. The timing and phasing of development should be synchronised with the delivery of appropriately located modern and sustainable waste management infrastructure that meets the needs of the local community. Opportunities to integrate waste management into proposed new development should be considered.</p> <p>Services provided should encourage and enable communities to follow the waste hierarchy – reduce, re-use, recycle, recover, with landfill as the last resort. Waste minimisation and resource efficiency should be at the heart of all new development. The design of buildings and supporting infrastructure should consider their future repair and eventual demolition in the selection of construction mechanisms and materials ('cradle-to-cradle' design).</p> <p>Climate Change Climate Change is a key matter which impacts on a number of different topics and is also a significant issue in its own right. In light of this, your plan should ensure it supports and encourages both limiting and adapting to climate change.</p>
41	Coal Authority	<p>As you will be aware there is coal mining legacy within the Stafford area in the form of; 3 mine entries, thick coal outcrops which may have been subject to historic unrecorded workings and fissures and breaklines.</p> <p>I can confirm that the Coal Authority has no specific comments to make at this early stage in the process.</p>
42	Jackson, J.	<p>Section 2.1 "... making sure new services and facilities such as health, education and leisure activities are provided to the local community ..."</p> <p>Response: This was not the case with Hixon in the last Local Plan. How can the borough council guarantee such joined-up thinking/planning?</p> <p>Section 2.6 "- To improve the quality of life of local people by providing a safe, clean, attractive place to live and work and encouraging people to be engaged in developing strong communities that promote health and well-being."</p> <p>Response: Some settlements are already at this stage, which is why the residents have chosen to live there. It needs to be remembered that significant development can change the character of an existing "desirable" community, and not for the better. Such a negative impact then results in current residents leaving, and what was a "good" place has been undermined.</p> <p>Section 2.7 "... "where will people be living and working?" and "what will they be doing in their spare time?" ..."</p> <p>Response: Any response to these types of questions will merely be guesswork. It is impossible to accurately predict so far into the future.</p> <p>Section 3.1 "... excellent strategic transport links ... with High Speed Rail 2 (HS2), ..."</p> <p>Response: HS2 is still far from becoming reality.</p>
43	Chartley Parish Council	<p>Para 1.3 refers to the 'latest Local Development Scheme' ie the timetable. The one on the web site is out of date.</p> <p>Para 3.7 says that the draft National Planning Policy Framework(NPPF) has a new chapter on Rural Housing. It has a new section but not a new Chapter.</p> <p>Para 3.19 identifies the needs of the community but this gets outweighed by the Strategic Housing Market Assessment(SHMA) which is very general and the current housing waiting list which is very poor. Few people put their name on the list.</p> <p>The SHMA is on too course a scale – down to Borough Ward area. The Borough say that this is the most detailed level available from the census but this is not true. Census Output Areas contain about 125 houses, the Parish of Colwich, for instance, has about 7 OAs.</p> <p>Para 3.44 Where is the support for walking and Rights of Way?</p> <p>Para 3.70 Misses out Chartley Moss – a Ramsar site.</p>
45	Network Rail	<p>Network Rail is keen to work closely with Stafford BC particularly in relation to any development proposals at or adjacent to the railway station to ensure that station enhancements and capacity improvements are given due consideration.</p>

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49	Staffordshire County Council	<p>Transport We have already begun a dialogue over the transport evidence that will be required to inform and support the Plan. This will include engaging with Highways England throughout. We will continue to work with you as the Plan evolves. The NPPF 2018 paragraph 107 recognised the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance. This follows the publication earlier this year of the Governments' National survey of Lorry Parking and joint MCHLG and DfT letter to chief Planning Officers. Given this and the loss of spaces at the existing Doxey Road lorry park consideration may need to be given to whether there is an adequate supply of such facilities remaining in the Borough.</p> <p>Public Health It will be essential that the Plan ensures that people can live healthy and active lifestyles. In that respect the Plan should have regard to and cover the wider determinants of health and the specific role Plan policies can have on the health of local residents. It is suggested therefore that there is a continued dialogue and consultation with our Public Health department on the application of the Plan policies and decision making in respect of the effect on public health. The Plan will need to have regard to issues around an ageing population, including the housing options that may be required. The County Council is in the process of undertaking a countywide project to provide an insight and intelligence around the need for and supply of specialist housing for older people across Staffordshire up to 2037. The 'Next Generation Care' project is directed at helping potential suppliers and developers of specialist accommodation to make informed business decisions around future development opportunities in Staffordshire but the evidence base and assessment is equally relevant to plan making. One of our key reports, the 'Staffordshire-wide evidence base: Extra Care and Care Homes,' provides evidence on the current and future extra care and care home needs of the people in Staffordshire, and provides the outcomes of modelling based on current and predicted needs and gaps or pressure points. This report could be useful in helping determine the proportion of specialist accommodation for older people needed for the Borough and plan for that accordingly. In addition to the county evidence base, we are developing a series of district focused Locality Analysis reports. These will provide information on the current supply and location of all specialist accommodation for older people, including any major developments which have planning approval, in the main towns and conurbations. They also explore accessibility by foot and public transport of the main services and amenities that are important for supporting an independent living model, using reasonable walking distance calculations for an older person. The evidence base and locality analysis, can be found at https://www.staffordshire.gov.uk/health/Information-for-providers/Information-for-providers.aspx In addition to the above documents officers at the County are available to discuss options and considerations for mainstream housing suitable for older person with lower or no care needs such as adaptable housing, bungalows etc. This may include providing data to support use of enhanced buildings regulations part M.</p> <p>Economy We have been working alongside you in considering the scope of the employment evidence required for the plan, including the needs assessment (EHDNA) work. We will continue to assist and input throughout the process of determining employment needs and at a later stage provide assistance in consideration of any skills and training requirements.</p> <p>Ecology Paragraph 2.8 appears contradictory as it starts by recognising the three pillars of sustainability and then goes on in the same sentence to leave out a tangible environmental aspiration while making clear that there are targets for housing and employment development: The adopted Plan for Stafford Borough's spatial vision seeks to deliver sustainable development through economic, social and environmental objectives through a place-based approach, through the creation of 500 new homes and 8 hectares of employment land every year over the Plan period 2011-2031, in order to provide for the future needs and prosperity of residents. New housing and employment could deliver a 20% net gain for biodiversity, as is the case already in Lichfield District.</p> <p>Archaeology and Historic Landscape Character It is welcome that this scoping document recognises the value of the historic environment of the borough, and in particular the powerful influence that the historic environment can have on people's quality of life, its contribution to character and distinctiveness of an area, and its role in supporting other objectives such as tourism, green infrastructure, and recreational objectives. The historic environment (not just historic listed or unlisted buildings, but also, for example, archaeology, historic character, street patterns), can also help engender a sense of pride, identity, and place, and it is important that the new local plan for Stafford, like the existing 'Plan for Stafford Borough', identifies the contribution that this resource continues to make to Stafford Borough's unique rural and urban landscapes. In order to do this the New Local Plan, in respect to the Historic Environment (including designated and undesignated below-ground archaeology and landscapes), and as required by the NPPF, should be based on adequate, up-to-date and relevant evidence. The production of the New Local Plan provides an opportunity to consider a great deal of 'new' evidence which was not available when the current plan was being produced. This 'new' evidence includes: • Extensive Urban Surveys for Stafford, Stone, Eccleshall, and Church Eaton, see https://www.staffordshire.gov.uk/environment/eLand/planners-developers/HistoricEnvironment/Extensive-Urban-Survey/Staffordshire-Extensive-Urban-Survey-Project.aspx for more. These synthesise our knowledge and understanding of the heritage assets which contribute to the development and character of these urban areas. • The results of the Chase Through Time Project, see www.chasethroughtime.info. Utilising LIDAR this project identified hundreds of previously unknown heritage assets, many of which relate to the two Great War training camps which were built on Cannock Chase. In addition to considering the above, it would also be important to re-visit the sources that were (potentially) used as the evidence base for the current plan. These</p>

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		<p>are likely to have been updated or are still relevant, and include:</p> <p>Information on the Heritage List for England (i.e. designated heritage assets such as scheduled monuments, listed buildings, registered parks and gardens), see www.historicengland.org.uk/listing/the-list for more</p> <ul style="list-style-type: none"> • The Staffordshire Historic Environment Record, see https://www.staffordshire.gov.uk/environment/eLand/planners-developers/HistoricEnvironment/Historic-Environment-Record/HistoricEnvironmentRecord.aspx for more. This includes both designated and undesignated heritage assets and comprises information on above and below ground heritage, historic landscapes, and records of previous archaeological works • Conservation Area Appraisals • Historic England's Heritage At Risk Register, see https://www.historicengland.org.uk/advice/heritage-at-risk/search-register/ for more • Stafford Borough Historic Environment Assessments, which includes Eccleshall, Gnosall, Stafford Environs, Stone, and the Haywoods, see https://www.staffordshire.gov.uk/environment/eLand/planners-developers/HistoricEnvironment/Projects/Historic-Environment-Assessments.aspx#StaffordBoroughHEA . It is noted that these documents are now nearly a decade old and it is acknowledge that a degree of review of them is advised to ensure that they continue to be relevant to the aims of the District Council in protecting and enhancing all types of heritage asset • Staffordshire Historic Farmsteads Assessment, see https://www.staffordshire.gov.uk/environment/eLand/planners-developers/HistoricEnvironment/Projects/Historic-Farmsteads.aspx • Staffordshire Historic Landscape Character Assessment, see https://www.staffordshire.gov.uk/environment/eLand/planners-developers/HistoricEnvironment/Projects/Historic-Environment-Projects.aspx#HistoricLandscapeCharacterisation — data available from the Staffordshire Historic Environment Record <p>In addition to this evidence base, in relation to the Historic Environment, the producers of the New Local Plan should also be steered by recent guidance produced by Historic England on the 'Historic Environment in Local Plans' and 'The Historic Environment and Site Allocation in Local Plans', see https://www.historicengland.org.uk/advice/planning/plan-making/ for more. This guidance advocates a strategic approach (including the development of strategic policies for the conservation of the historic environment) to the conservation and enjoyment of the historic environment and notes the inter-relationship between the objectives for the historic environment and other elements of the plan — this approach is to be supported and should be considered by the producers of the New Local Plan.</p> <p>Rights of Way</p> <p>The plan recognises that such routes are providing valuable access to the countryside, local parks and open spaces, helping to promote healthier lifestyles (3.48). Ultimately the Plan needs to aspire to improve accessibility on the walking, horse riding and cycling networks (including towpath links) throughout the Borough. The Scoping Report identifies new developments should seek to improve non-vehicular public access to the wider path network. It is essential that the plan should strive to increase the levels of physical activity and the public rights of way network should be integral to any schemes that are developed to promote this. The Plan will also need to ensure that where necessary development makes appropriate mitigation to ensure the public path network is protected. If amendments to the path network are required to allow development to take place then these Orders need to be processed through the Borough Council before construction begins. The County Council should always be consulted in such cases. In relation to such development the planning authority need to be reminded that there are likely to be many non-definitive routes across proposed development sites which should be considered by any applicants. In many cases these routes could have become rights of way by virtue of established usage over many years and should be treated as public. There will also be sites where such usage or historic evidence has already resulted in applications being made to the County Council under Section 53 of the Wildlife and Countryside Act 1981 to add or modify the Definitive Map of Public Rights of Way, which affects the land in question.</p>
50	Staffordshire Wildlife Trust (SWT)	<p>1.4 Key stages of preparing the Local Plan - we have some concerns that Producing the Evidence Base is to be actioned from Autumn 2018 – Spring 2019; this is very little time to gather the ecological data required for a robust evidence base, as required by the revised NPPF which states in paragraph 174 that plans should: '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.'</p> <p>The Planning Practice guidance gives a fuller list of the features that planning authorities need to map, including the distribution of protected and priority habitats and species, and areas of irreplaceable natural habitat, such as ancient woodland.</p> <p>Currently, ecological data for the borough is incomplete and out of date. Staffordshire Ecological Record holds habitat data for only around half of the borough, and many Local Wildlife Sites (LWS) have not been re-surveyed for over 10 years, and many over 20 years. There are also many un-surveyed areas with potential to be designated as LWS, as well as areas of priority habitats that have yet to be mapped, and there are likely to be further ancient woodland parcels that have not yet been added to the national register. Surveys carried out by HS2 have highlighted many new areas of interest along the route, as well as 'new' ancient woodlands. SWT's limited surveys over the last 2 years have also resulted in the discovery and designation of several new sites, and extension or reduction of others.</p> <p>It would also be useful to gather data on the areas of accessible natural green space (as well as more managed open spaces) available to residents in the recognised settlements. This is important for mental and physical health and well-being. Rural locations can sometimes have the least resource in this regard, although close to countryside and footpaths, there may not be many open spaces with public access.</p> <p>It would be impossible to complete the data as listed in the guidance in the short time period, and outside of the main survey season. However, key areas where</p>

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		<p>more development is expected or where decisions will be made about areas for development, should be focussed upon as part of the local plan process. Some gaps may be filled via aerial photography interpretation, as well as walkover surveys, and areas of potential ecological interest highlighted for further survey to feed into the decision making process as soon as possible. It is important that this data is available, in order to protect and avoid high value habitats and features, and plan where development can best enhance nature networks and the local environment.</p> <p>2.8, 2.9 The Plan for Stafford Borough 2011-2031</p> <p>While the current plan has had many successes, we are concerned that environmental objectives are not being met. The Green Infrastructure Strategy 2009 put forward many good objectives for Stafford and Stone, that have not been delivered, and several areas of key green infrastructure have been lost to development. The new local plan needs to reflect on the challenges in this area, and using good data and following national guidance, ensure green infrastructure of all types receives the same attention and delivery aims as the built environment. This will make Stafford Borough a more sustainable, healthy and desirable place to live and work.</p>
55	Stone Town Council	<p>At a meeting of Stone Town Council's General Purposes Committee on 4 September 2018, the Committee resolved to submit the following comments to Stafford Borough Council in respect of both consultations:</p> <ul style="list-style-type: none"> • Concern was expressed that any attempt to change the current policy regarding allocation of housing within the Settlement Boundary could remove any method of containing development in and around Stone in the future. The Settlement Boundaries currently define where development is or is not appropriate and also define the edge of the countryside. <p>In the case of Stone town, bearing in mind minimum housing targets for the current plan period have already been exceeded, there is no evidence that Settlement Boundaries aren't working; evidence is to the contrary. This might also be true for Stafford i.e. towns in the settlement Hierarchy in positions 1 and 2 could retain Settlement Boundaries and other methods of choosing site sustainability could be applied to Key Service Villages and others.</p> <ul style="list-style-type: none"> • Whilst Stafford Borough Council appear to have targets for housing and business development there appears to be no such target for green spaces. • Members would like to have seen the evidence for the assumptions regarding future housing demand. • There was concern that a new Plan for Stafford Borough, being more current than the town's Neighbourhood Plan, could undermine the work being done preparing the town's plan. • A copy of Stone Draft Neighbourhood Plan is submitted to Stafford Borough Council to illustrate the Town's view of land usage and green spaces in Stone.