



# **Local Plan 2020-2040**

## **Issues and Options Consultation Summary Report**

**Consultation period:**

**February 2020 – April 2020**

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# **1. Introduction**

## **Purpose of the document**

- 1.1 The Issues and Options consultation summary report has been prepared in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This report provides a summary of the preparation of the Stafford Borough Council Issues and Options consultation process and the representations received.
- 1.2 The consultation was designed to enable an understanding of the opinions from the public and key stakeholders surrounding key issues within the borough which, in turn, has contributed towards the development of the Preferred Option for the Local Plan 2020-2040.
- 1.3 The Issues and Options consultation was conducted in accordance with the Stafford Borough Statement of Community Involvement which was adopted on 20 November 2018 and explains how Stafford Borough Council will engage with key stakeholders including the local community and businesses, to prepare planning policy documents and determine planning applications. Whilst it focuses on describing who is consulted, how and when, it also describes the main functions of the planning system in a user-friendly manner to help strengthen community involvement and provide better understanding of the planning system.

## **The Local Plan 2020-2040**

- 1.4 The Stafford Borough Council (SBC) Local Plan 2020-2040 is currently being produced and will set out the vision for the future of the borough and the policies that will contribute towards achieving this. The plan will cover key development topics, including housing, employment, retail, and the social and physical infrastructure necessary to support these new developments.
- 1.5 The preparation of the local plan will also take account of recent and anticipated changes in central government policy which will impact upon the definition and preparation of a local plan.
- 1.6 The local plan will be used when determining planning applications in the future and upon adoption, it will replace the Plan for Stafford Borough 2011-2030 Parts 1 and 2.

# **2. Methodology of the Issues and Options Consultation**

- 2.1 Stafford Borough Council published the Issues and Options report in February 2020 as part of the preparation for the Local Plan 2020-2040. The Issues and

Options document was the first formal stage and sought to set out the key issues being faced within the borough. As part of this, the consultation stage sought to explore the potential options for addressing the identified issues.

- 2.2 The council consulted on the Issues and Options report between the 3 February 2020 and the 21 April 2020. The original deadline for response was the 30 March 2020 but because of the start of the Covid-19 pandemic and the national lockdown, the deadline was extended.
- 2.3 In line with the Statement of Community Involvement (SCI) the consultation invited residents, businesses, key stakeholders and the wider community to make representations.
- 2.4 As specified by the SCI the following methods of engagement were used for the Issues and Options consultation:
- Letters and emails were sent to all those on the local plan consultation database.
  - A parish forum meeting was held to inform representatives from parish councils of the consultation and present the key issues.
  - A series of public exhibition and staffed drop-in consultation events were held around the borough (see Table 1).
  - Posters notifying members of the public of the consultation were placed in prominent positions around the borough, e.g. in local shops and supermarkets (see Table 1).
  - A Press Notice was issued.
  - The consultation period and specific events were promoted via Facebook and Twitter.
  - Copies of the documentation were available to view at Stafford Borough Council’s Civic Centre and the libraries around the borough.
  - All documentation including advertising material, e.g. posters, evidence base documents, downloadable response forms and access to the MDS system online response form were placed on the council website.

Table 1: The locations of the Staffed drop-in sessions and the poster displays which formed part of the local plan issues and options consultation stage.

<b>Staffed Drop-in Sessions</b>
Locations: <ul style="list-style-type: none"> <li>• Stafford</li> <li>• Stone</li> <li>• Eccleshall</li> <li>• Hixon</li> </ul>
<b>Poster Displays</b>
<ul style="list-style-type: none"> <li>• Parish Council Notice Boards</li> <li>• Stafford Locations: <ul style="list-style-type: none"> <li>○ Stafford Borough Civic Centre</li> <li>○ Stafford Leisure Centre</li> </ul> </li> </ul>

- Stafford Library
- Baswich Library
- Oddfellows Hall
- Gatehouse Theatre
- Tesco Superstore (Newport Road)
- Sainsbury's Superstore (Chell Road)
- Asda Superstore (Queensway)
- Stone Locations:
  - Stone Town Council Offices
  - Frank Jordan Community Centre
  - Stone Leisure Centre
  - Co-op Food Store (Eccleshall Road)
  - Morrisons (Church Street)
  - Aldi (Stafford Road)
- Eccleshall Locations:
  - Eccleshall Library
  - Eccleshall Community Centre
- Gnosall Locations:
  - Gnosall Library
  - Grosvenor Community Centre
  - Co-op Food Store (High Street)
- In other rural areas posters were displayed in locations, such as shops, post offices, community centres and other local facilities.
- Blythe Bridge Library

2.5 Written responses were invited to be submitted via post, email or online with response forms provided at libraries for those without access to a computer.

2.6 In order to fulfil the requirements of the Duty to Cooperate, all neighbouring authorities and consultation bodies specified by the Regulations received notice of the consultation so they could raise any concerns.

### 3. Outputs from the In-person Consultation Events

3.1 The four staffed drop-in sessions around the borough attracted a total of 288 attendees, the split across the settlements is shown in Table 2 below.

Table 2: Shows the split of participants across the settlement which held staffed drop-in sessions as part of the consultation process.

<b>Settlement</b>	<b>Total number of Participants</b>
Stafford	66
Stone	19
Eccleshall	72
Hixon	131
<b>Total</b>	<b>288</b>

3.2 At each session attendees had the opportunity to look at the exhibition boards specifically prepared for these events, examine the Issues and Options

documentation, including key evidence reports, and speak to staff who were on hand to answer questions and discuss the points raised.

3.3 Many of the issues raised at these events were common across all events.

These included:

- The required scale of development and how this is justified.
- The desirability, or otherwise, of a new Garden Community and its impact on the remainder of the borough.
- The most desirable location for a Garden Community with the majority of the attendees expressing a preferred location of Meecebrook, although some did express their concern about the potential for land contamination on the site.
- The need for a greater mix / range of housing to be brought forward so that all members of the community are catered for. Examples cited included the need for smaller affordable houses in rural areas, more affordable housing generally, a range of housing types to better accommodate older people and those with disabilities, houses better suited to multi-generational living and home working.
- Concerns expressed arising from the perceived loss of character of the area because of recent development and the impact of future development with many expressing the desire that recent mistakes should not be repeated.
- Concerns about how climate change mitigation and adaptation measures will be integrated into the local plan, and how this will impact housing development in the area.
- Concerns were raised about the potential lack of infrastructure delivery to support housing development, and how this would negatively impact the existing local services and facilities.
- Concerns about traffic congestion in Stafford particularly but also across the borough and how additional development will impact upon Stafford town and their own parts of the borough.
- Concerns regarding how HS2 will affect the area.
- Insufficiency of public transport in both town and rural areas of the borough.
- The need to ensure that new employment opportunities are brought in to support the anticipated housing growth.
- The changing nature of the town centres and how these might be improved especially in terms of the quality and range of retail on offer.

3.4 In addition, there were specific issues raised at the individual events over and above those noted above. These have been summarised below.

At the Stafford event:

- Concern was expressed at the perceived decline of Stafford town centre and how the local plan might help address this.
- Congestion in the town centre and the main routes approaching the town centre.
- The acceptability of some development at Gnosall / Haughton but not to the scale suggested by a potential Garden Community owing to the lack of capacity on the A518.

At the Stone event:

- Concern was expressed at the potential impact of Meecebrook especially on the role of Stone and the local road network.
- Concern was expressed in respect of the scale of recent development in the town and the sustainability / accessibility of sites on the edge of town which might be considered for future development.

At the Eccleshall event:

- Some residents argued that developer contributions are not currently being used to provide new services and facilities in the surrounding areas.
- Concerns were raised about the impact of a new Garden Community on transport, services and facilities in the area.
- Lack of car parking in the village centre.
- It was requested that Slindon saw the development of a small-scale housing site on an existing car park.
- Concern that the delivery of Meecebrook might result in the demolition of the existing settlement of Cold Meece.

At the Hixon event:

- Considerable concern was expressed about the development of Hixon airfield, which is being considered as a Strategic Development Site.
- The issue of traffic and associated congestion on the roads surrounding Hixon were commonly discussed. It was argued that future development in the area would exacerbate these issues, particularly if Hixon airfield was developed.
- Some people voiced concerns that air and light pollution would increase as a result of future development.
- It was stated that flooding was already an issue in Hixon, with some of the major roads being affected. This has resulted in people being stranded in the village and has had a negative impact on local businesses.
- It was also stated that Hixon airfield is currently affected by flooding, and that this should be considered when potentially considering the development of the site.

- Some residents were concerned about how the adopted neighbourhood plan would fit into the local planning policy framework once the local plan has been adopted.
- Concerns were raised about how the development of the airfield would undermine the existing industrial uses in the immediate vicinity.

## 4. Outputs from the Online Consultation

- 4.1 In total there were 181 responses received to the Issues and Options online consultation. These are broken down by type of respondent shown in Table 3, with further details of these respondents being shown in Appendix 1.

Table 3: Shows the number of responses and percentage breakdown for each type of respondent.

Type of respondent	Number of responses	Percentage of total responses
Resident	65	36%
Landowner / Developer / Planning Consultant	70	39%
Government / Public Body including infrastructure providers	11	6%
Other Local Authorities	5	3%
Parish Councils / Neighbourhood Plan body	16	9%
Representative bodies	5	3%
Charities	6	3%
Other	3	2%
<b>Total</b>	<b>181</b>	<b>100%</b>

- 4.2 The vast majority of responses were submitted via email with a reasonable proportion of these, especially residents, utilising the downloadable response form. The majority of complex responses, e.g. those from developers and those from bodies prescribed by the Duty to Cooperate Regulations, did not utilise the form.
- 4.3 A significant number of respondents, especially residents, attempted to use the MDS system online response form but were frustrated by the system's instability, lack of user-friendliness and short log out times which made the system unsuitable for complex responses. This resulted in people giving up or providing their responses via email. Accordingly, in excess of 95% of responses received were inputted into the MDS system by officers to enable analysis of the consultation responses, which has been used in the preparation of this report.
- 4.4 As a result an alternative system will be used for the Preferred Option consultation.



- 4.5 The remainder of this report is formed by a series of Chapter-by-Chapter summaries of the key points arising from the analysis of the responses. This is then followed by the Appendixes to the document which list those who responded and provides a detailed analysis of the points made by all responses.
- 4.6 At this stage the council have not responded to individual responses but have considered the points made and the key themes in order to best inform the development of the Preferred Option and its component policies.
- 4.7 The full responses from each respondent are available to view here: [New Stafford borough Local Plan 2020-2040: Issues and Options Responses | Stafford Borough Council \(staffordbc.gov.uk\)](#)

## **5. Key Points from the analysis of the Consultation Responses**

### **5.1 Section 1 – Introduction**

#### **Key points**

- A number of respondents provided suggestions for additional evidence, the details of these can be seen in Appendix 2, Section 1 – Introduction.
- The council has considered all the suggestions and, in most cases, the requested evidence has been produced as part of the evidence base that has been used to inform the Preferred Option and will be published alongside this.

### **5.2 Section 3 – Vision and Objectives**

#### **Key Points – Vision**

- It is necessary for the local plan vision to relate seamlessly with other Stafford Borough Council strategies, such as the Corporate Business Plan, the Economic Strategy, and the Climate Change and Green Recovery Strategy.
- The vision should be redrafted and updated to take account of a range of factors including revisions to National Planning Policy Framework (NPPF), changed housing and economic context, Meecebrook, HS2, Climate Change and the more inclusive approach to a wider range of settlements.
- Any redrafting of the vision should lead to a shorter and more succinct version, and should result in a clear statement of the purpose and priorities of the Plan.

- The vision should explicitly address and respond to the climate crisis as a central function of the local plan.

### **Key Points – Objectives**

- Climate Change issues should be more prominent.
- The sheer number of objectives in the current plan is a distraction and leads to repetition.
- A spatially based approach was thought appropriate and should be retained in preference to a thematic approach.
- However, there was some agreement that the current spatial-based approach does lead to some duplication of objectives.
- A possible model to achieve this would be by the introduction of an overarching / cross-cutting set of objectives supported by a series of spatially based objectives.

## **5.3 Section 4 – Sustainability and Climate Change**

### **Key Points**

- There was a very marked split on the questions relating to whether Stafford Borough Council should expect standards in excess of current or future building regulations, e.g. standards relating to energy efficiency, water consumption etc. If this is to be pursued Stafford Borough Council will need to strongly demonstrate a place-specific justification for such a deviation plus a viability assessment of such an approach.
- A number of respondents queried the strength of enforcement in respect of such matters in the current plan and therefore the authority's commitment.
- The section concentrated on matters such as build standards and renewable energy, but a number of respondents suggested that the scope of the issues in respect of the section heading was greater and should include a wider range of matters such as, cycling for leisure and daily commuting, supporting the shift in fuel sources for personal fuelled transport (e.g. electric vehicles and/or hydrogen cars), changing life, work and commuting patterns, and design for areas prone to flooding.
- There was a desire expressed that renewable energy schemes should be considered in such a way that they sit alongside other development whilst recognising natural constraints and capacity.
- There was support for a wide range of potential sources for renewable energy, which included photovoltaic panels, wind turbines, anaerobic digesters. However, there were specific concerns raised with the main

points being in relation to the potential adverse effects on both the natural and historic environment.

## **5.4 Section 5 – The Development Strategy**

### **Key Points**

- This key section considered a range of issues including the scale and form of development, the settlement hierarchy, settlement boundaries, whether a new Garden Community should be pursued, and where.
- There were a large number of responses to this section with little in the way of apparent consensus.
- Drawing on the Economic and Housing Development Needs Assessment (EHDNA), a range of potential housing requirement options were presented by the Issues and Options document (ranging between 408 to 746 dwellings per annum). There was a range of support, but the greatest level of support expressed was for the higher growth levels, however, this support was largely developer-led, but there was also some support expressed by others including residents.
- As the government's emphasis is on delivery, it is therefore essential that the existing commitments, especially the Strategic Development Locations, are delivered. The new plan should be structured to enable this to happen.
- In light of the government's new housing requirement the borough will need to ensure there is an adequate supply of small / medium sites, especially in the earlier years of the plan. This is likely to continue to put the Key Service Villages under pressure along with Stafford and Stone.
- The new, more inclusive, settlement hierarchy was broadly welcomed as was the inclusion of smaller settlements.
- There was support for the principle of some development being directed toward the settlements in the north of the borough, but in the absence of a Green Belt review this is likely to be restrictive with the exception of some replacement and infill development.
- It was considered that all reasonable spatial options had been considered. The following options were the most well received; variations on the intensification around edges of current larger settlements and within town centres; a wider dispersal of development; and the Garden Community. String and wheel patterns of development were not well received.
- Strong support for a Garden Community was evident with Meecebrook receiving the strongest levels of support. Hixon was the option receiving the second most statements of support, but also received the greatest number of specific objections.

- The EHDNA's proposals for required employment land were considered reasonable, as were the assumptions for future employment land loss.
- There was strong support for the continuation of employment land to be concentrated at Stafford and Stone. Some concern was expressed that, in the event of a Garden Community coming forward, sufficient employment land should be provided to support such a development.
- There were mixed levels of support for the proposition of settlement boundaries in smaller settlements with no clear consensus emerging.
- The proposed methodology for the determination of settlement boundaries received equal levels of support and opposition.

## **5.5 Section 6 – Delivering Economic Prosperity**

### **Key points**

- There was relatively little response to this section, with those who responded providing general broad support for the proposals contained in the Issues and Options document.
- Respondents recognised the need for rural located employment land and premises as well as at the main towns and the Garden Community.
- The potential for the expansion / redevelopment of current Recognised Industrial Estates (RIEs) was discussed to ensure their continuing relevance and viability.
- Some respondents suggested that under-utilised or redundant sites in Stafford should be redeveloped before new sites are allocated and developed.
- The future role of Meaford and the potential for expansion of the 3 Major Developed Sites, including Meaford, were raised, though no new sites were proposed.
- Some additional employment sites were promoted.
- There was some conditional support for a policy to prevent the redevelopment of employment premises to residential units.
- A number of respondents discussed the need for a balanced portfolio of employment sites catering for starter, small and medium sized employers as well as bigger employers, with small and medium units being available in rural areas.
- There was no perceived lack of office space in the borough, especially in light of changing work patterns as a result of the Covid-19 pandemic.
- There was support for the provision of genuinely fast broadband across the borough to support new and existing businesses, and the increased prevalence of home working.

- The importance of tourism and leisure to the economic future of the borough was recognised including the need for an enhanced policy framework and liberalised approach toward the provision of residential canal moorings.
- The themes of culture, cycle tourism, canals, and visitor economy specific to Trentham Gardens were all proposed as needing to be more explicitly addressed.

## **5.6 Section 7 – Delivering Town Centres that address Future Needs**

### **Key Points**

- There was relatively little response to this section with general broad support for the proposals contained in the Issues and Options document whilst at the same time expressing concerns for the future viability and role of the borough's town centres.
- There was agreement that the proposed town centre hierarchy of Stafford, Stone and Eccleshall was appropriate and that their individual characters should be preserved.
- There was concern that prior policy of enabling out of town retail has undermined the established town centres.
- There was support for the role of the centres to be renewed to enable their regeneration and renewal.
- There was concern about the state of Stafford town centre and its apparent decline.
- Specific concern was expressed relating to congestion and the inadequacy of parking provision for Stafford and Eccleshall.

## **5.7 Section 8 – Delivering Housing**

### **Key Points**

- There was considerable response to this section with a wide range of views expressed.
- There continues to be considerable support for the prioritisation of brownfield land.
- There was mixed support for the utilisation of density thresholds, but if implemented the preferred approach was a range of thresholds to take account of the varying character of the borough.
- There was significant concern about the employment of the Nationally Described Space Standards especially in the absence of any locally derived evidence to justify the approach.
- There was some support for the proposed housing mix, though there was also some support for the view that there is a shortage of smaller dwellings, especially in rural areas.

- There was general support for a policy requiring 10% of affordable homes delivered on new major development sites to be wheelchair accessible, but developers in particular cited the need for locally derived evidence to justify the requirement.
- There was some support for the provision of bungalows but in general there was strong opposition by developers for such a requirement. To enable the provision of bungalows there was some acceptance that the land take should be minimised.
- There was a broad agreement that it was possible to provide the required number (ranging from 252 to 389 affordable dwellings per annum) of affordable housing units. The disagreement arose in respect of the overall scale of housing that would be required to achieve this.
- The housing providers have highlighted their eagerness to work with the council along with changes in financial regulations which might enable a greater level of affordable housing provision.
- The housing providers are open to the development of a local definition of affordable housing, as per the West Midlands Combined Authority, that will encourage delivery of a diverse range of affordable housing types that will meet local needs.
- There was a discussion about the role of Rural Exception Sites in the provision of rural affordable housing including the citing of the approach taken in East Cambridgeshire District where there is a presumption in favour of genuinely community-led schemes. This presumption in favour even extends to land not identified for development and includes land outside of development envelopes i.e. Rural Exception Sites.
- There was considerable interest in Custom and Self Build homes (CSB). As part of this, there was a general view that a blanket requirement placed on larger developments was an inappropriate way forward due to the relatively low number of people on the Self Build Register, and the view that those who want to self-build their home may not want to be on the edge / part of a larger estate. Rather a more appropriate approach would be to encourage smaller sites, e.g. variously up to 5 or 20, to be allocated specifically for CSB.
- It was viewed that it is inappropriate for the only form of development in smaller settlements to be CSB, as this would disadvantage some elements of the community, i.e. those less able or unwilling to go down the CSB route, therefore some small commercial sites should be permitted as well.

## **5.8 Section 9 – Delivering Quality Development**

### **Key Points**

- The majority of respondents supported the range of proposals put forward in this chapter.
- Any standard or methodology formulated as part of new policy should be based on robust evidence.
- That the increased costs associated with aspects of the proposals have to be considered.
- That no standard or requirement should be mandatory i.e. there should not be a mandatory need to allocate space within large developments for food growing or that 'large' or 'complex' sites should not automatically be sent to a Design Review Panel.

## **5.9 Section 10 - Environmental Quality**

### **Key Points**

- Whilst there was some support for the local plan to support the transition from petrol / diesel vehicles to hydrogen / electric powered vehicles. There was concern expressed that in reality the planning system's ability to do this is relatively limited and that this will need to be primarily affected via a combination of legislation and Building Regulations.
- That development should be located in the most sustainable areas and when sites outside of the main towns are assessed, access to public transport should be considered.
- Air quality was perceived as an important issue but was seen as difficult to achieve solely via the planning system. The likely improvement as a consequence of a shift away from hydrocarbon fuels was noted as was the need to protect the air quality for sensitive environments and the most vulnerable in society.
- The contribution of trees and hedgerows to the improvement of air quality and the reduction of heat island effects was noted.
- Support was expressed for a scheme whereby any development likely to result in an increase of NO<sub>2</sub> deposition on these sites in Stafford Borough must contribute to a mitigation programme.

## **5.10 Section 11 – Health and Well-being**

### **Key Points**

- There was strong support that Health and Well-being should be an integral part of the plan, but there was little agreement as to whether

this might be achieved via an inter-weaving approach or via a bespoke policy.

- Should an inter-weaving approach be adopted the themes considered appropriate for inclusion were housing, the natural environment including nature-based solutions, green infrastructure, the historic environment, non-motorised transport, e.g. walking, cycling, riding, and the canal system.

## **5.11 Section 12 – Connections**

### **Key points**

- Whilst the proposed approach to the delivery of sustainable transport was broadly supported there was a common concern that the borough needed to go further in order to address the challenges posed by societal and climate change. This revolved around the future spatial pattern of development and the need for much greater access, provision and utilisation of public transport.
- Concern was raised over the current state of public transport and that businesses based in rural areas are finding it challenging to recruit and retain staff in part due to the lack of regular and reliable public transport.
- There were five primary areas of discussion that arose from the responses: public transport; cycling and walking; the decarbonisation of personal motorised transport; sustainability and the environment; and Garden Community specific comments. Within these discussions, the associated infrastructure requirements and how development should fund these figured quite prominently.
- Key providers of transport infrastructure, which included Staffordshire County Council, Highways England and HS2, were supportive of the proposed approach being taken forward.
- There was a strong demand for the provision of new and improved infrastructure to enable the safe adoption of walking and cycling in respect of existing developments, new developments and connections between settlements to enable the formation of a borough-wide network.
- Staffordshire County Council recognised the issue of Heavy Goods Vehicle (HGV) parking in Stafford Borough, where the reduction in capacity in Stafford itself is an issue, especially with new and proposed expansion of employment and commercial areas. Many existing employment areas suffer from inappropriate and poorly equipped overnight HGV parking and would likely benefit from designated facilities for HGVs both for short and longer stay.



- In respect of parking standards, the majority of responses were supportive of the principle for residential and non-residential development, however the detail was viewed as critical in terms of making this approach work in practice.
- Regarding new electronic communication infrastructure there was a commonly held view that this was currently, at best, patchy, and that this should be upgraded at least in line with government targets. However, there was again concern that there is little the planning system can achieve in this respect and that the issue should be pursued via building regulations.

## **5.12 Section 13 – Viability and Delivery of Development**

### **Key Points**

Whilst no specific questions were asked on this section a small number of comments were made. These included:

- That Community Infrastructure Levy (CIL) should be adopted by the borough for all development including single plots. This should be set in “tablets of stone” and allocated to all areas, such as, health, education, roads etc in agreed proportions.
- Concern that despite its robust policy on affordable housing, the council has, in most cases, failed to deliver this.
- Local infrastructure such as transport improvements are almost totally absent. This is a broader issue than just transport and should include, for example, redressing inadequate community and medical facilities.
- New open space to serve additional housing is massively below national standards and could be seen as a major failure.
- Perceived poor quality of recent development.
- The suggestion that the borough should utilise an appreciable part of the government’s ‘New Homes Bonus’ of more than £11,000,000 paid to Stafford Borough Council in the last 5 years to provide targeted funding for the existing deficiencies.

## **5.13 Other Observations**

In addition, a number of observations were made by respondents in respect to the following:

### **Duty to Cooperate**

A number of Duty to Cooperate responses were made by a number of other local authorities including the Black Country Authorities (BCA), East Staffordshire Borough Council (BC), Staffordshire County Council (SCC) and

Lichfield DC proposing joint working on cross boundary issues. In some instances, there was the additional suggestion that Stafford Borough might wish to consider assisting a number of these authorities to address their housing shortfalls, such as BCA, Newcastle-under-Lyme BC and Stoke-on-Trent CC.

### **Issues and Options documentation**

- The consultation document was seen as being too large and complicated for people who are not specialists in the field.
- The document required too much thought.
- The document was considered to be too strategic and not sufficiently focussed on the locality, i.e. it was too vague.
- The document was seen as fundamentally flawed in that Climate Change was perceived to be an “add-on” in the document and did not address the need to address the economy driven “business as usual” approach.
- It was suggested that the consultation document will need to be fundamentally revisited in light of the Covid-19 pandemic owing to the social and economic impacts.
- The Plan and supporting documents bog down the reader. An executive summary of the supporting evidence would have been helpful to allow the reader to understand the background to some of the items.
- Suggestion that the following topics should be more specifically covered:
  - Flooding
  - Equality and accessibility
- Too much duplication.
- The document addresses matters that the planning process, as presently set up, has little hope of delivering.

### **Issues and Options consultation process**

- The form was too complicated and not user friendly.
- A “short form” option was suggested for those who perhaps only wanted to respond on a small number of questions. One suggestion in this respect was that on the form there could be a box to enter the question you would like to respond to, e.g. dropdown options, and then one or two free text boxes where the response can then be given. This would still enable you to cross-reference the questions to your main consultation form but create a wider diversity of respondents who are intimidated by the main form.

- A number of respondents requested that the electronic form highlighted how long it was before they were timed out / whether it was possible for this time to be extended.
- A number of respondents requested that the electronic form had a “save” button added.
- A number of people experienced a great deal of frustration in trying to complete the online form with its complexity, short time out and no save button, meaning that their work was frequently lost.
- The consultation events were held over a too compressed period of time.

#### **5.14 Other Responses**

A small number of respondents used the Issues and Options consultation to promote a site available for development. All sites that were submitted have since been included in the Strategic Housing and Employment Land Availability Assessment (SHELAA) 2022 Update and have been considered during the site selection work for the Preferred Option.

## **6. Next Steps**

- 6.1 Following on from the Issues and Options Consultation the responses have been taken into consideration during the preparation of the Local Plan 2020-2040 Preferred Option.
- 6.2 The Preferred Option will be going out for consultation during Autumn 2022, where a revised and simpler online consultation response questionnaire will be used alongside the in-person events.

## Appendix 1: List of Respondents

Each respondent was given a council assigned ID which were entered in order of receipt.

The full responses from each respondent are available to view here: [New Stafford borough Local Plan 2020-2040: Issues and Options Responses | Stafford Borough Council \(staffordbc.gov.uk\)](https://www.staffordbc.gov.uk)

<b>Coding</b>	<b>Name</b>	<b>Organisation</b>
1	Philip Sharpe	Inland Waterways Association
2	Patrick Thomas	Highways England
3	Miss J Cooper, Clerk of the Council	Gnosall Parish Council
4	Diane Clarke	Network Rail
5	Reiss Graham	HS2
6	Julia Banbury	Cannock Chase AONB Partnership
7	Rajvir Bahey	Sport England
8	Les Trigg, Town Clerk	Stone Town Council
9	Stewart Wilkes, Clerk	Bradley Parish Council
10	Brendan McKeown	Hixon Neighbourhood Plan Steering Group
11	Hixon Parish Council	Hixon Parish Council
12	Jack Robinson	Severn Trent Water
13	Michael Price	Stafford Riverway Link CIC
14	Mrs. C. Gill	Stowe by Chartley Parish Council
15	Mrs L Horritt	Doxey Parish Council
16	EiryL McCook	Homes England
17	Susan Atkins	Haughton Parish Council
18	Tim West	Eccleshall RUFC
19	Sue Stokes, Parish Clerk	High Offley Parish Council
20	Lisa Horritt, Clerk	Salt and Enson Parish Council
21	Melanie Lindsley	Coal Authority
22	Stacey Worden, Clerk	Eccleshall Parish Council
23	Clayton De Beauville	East Staffordshire borough Council
24	John Blount	Hopton and Coton Parish Council
25	Sarah Faulkner	National Farmers Union
26	David Price, Chairman	Seighford Parish Council
27	Douglas Rouxel	Stafford and Stone Green Party
28	Sara Williams, Chief Executive Carl Croft, President	Staffordshire Chambers of Commerce
29	James Chadwick	Staffordshire County Council
30	Black Country Authorities	Black Country Authorities
31	Ian Dickinson	Canal & River Trust
32	Liz Harrington-Jones	Chebsey Parish Council
33	Sarah Burgess	CPRE Staffordshire

34	Kezia Taylerson	Historic England
35	Stephen Stray	Lichfield District Council
36	Ministry of Defence	Ministry of Defence
37	Hazel McDowall	Natural England
38	Mike Shurmer	The Royal Society for the Protection of Birds (RSPB)
39	Kate Dewey	Staffordshire Wildlife Trust
40	Liz Harrington-Jones	Swynnerton Parish Council
41	Bridget Fox	Woodland Trust
42	John Fraser	Yarnfield and Cold Meece Parish Council
43	Edward Fox	South Staffordshire Council
44	R Baskeyfield	Hourigan Connolly
45	Chris Simmons	Chaser Lark
46	Graham Fergus	First City Ltd
47	Niall Beattie	Trine Developments Ltd
48	Angela Smedley	Fisher German
49	Alex Jones	Adlington Retirement Living (registered as Gladman Retirement Living Ltd)
50	Raleigh Hall Properties Ltd	CT Planning
51	Mr N Talbot	Mr N Talbot
52	Mr T Talbot	Mr T Talbot
53	Jessup Brothers Ltd	Jessup Brothers Ltd
54	Andrew Hiorns	Hallam Land Management
55	Stoford Properties	Stoford Properties
56	Nic Scott	Pickstock Homes
57	Landowner Land adjoining Stafford Road and Blurtons Lane at Fieldhouse Farm, Eccleshall and Land to the north of Stone Road and east of the Burbage, Eccleshall	Savills
58	Lord Stafford Estates	Lord Stafford Estates
59	West Midlands Housing Association Planning Consortium	Tetlow King Planning
60	S Rabjohns	Mr Breakwell
61	Commercial Estates Projects Ltd.	Avison Young
62	The Strategic Land Group	Emery Planning
63	Graham Heath	Graham Heath Group Ltd
64	Clarkes Farms Ltd and Dugmore Family	Clarkes Farms Ltd and Dugmore Family
65	Mrs Tonge	Hixon Airfield Services
66	Muller Property Group	Muller Property Group
67	Aston Homes Land Ltd	Aston Homes Land Ltd
68	P W Shaw	P W Shaw, Land at Queensville, Stafford

69	Millwood Land (Stafford)	Millwood Land (Stafford)
70	Mr N Ash	Mr N Ash
71	P W Shaw, Burston Villa Farm	P W Shaw
72	Sally Tagg	National and Custom Self Build Association (NaCSBA)
73	Gillan Paris	Inglewood Investments
74	Richborough Estates (Land at Horseshoe, Gnosall)	Richborough Estates
75	Richborough Estates (Land at Uttoxeter Road, Stone)	Richborough Estates
76	Matthew Stafford	St Modwen Properties PLC
77	Staffordshire University	Staffordshire University
78	Baden Hall Estate	Baden Hall Estate
79	Trent vision Trust	Aspbury Planning Limited
80	St Philips, Land to the east of Castle Street, Eccleshall	Avison Young
81	Taylor Wimpey, Land North of Shaws Lane, Eccleshall	Taylor Wimpey North Midlands
82	Mr Chris Shaw	Cotes Lodge Farm
83	Joe Ledwidge	Morgan Sindall
84	Richard Hickman	St Modwen Properties PLC
85	Alastair Budd	Trentham Leisure Ltd
86	Tim Dean	Dean Lewis Estates
87	The Trustees	Community of St Mary's Abbey, Colwich
88	Diocese of Lichfield	Fisher German
89	Josh Plant	Gladman Developments
90	Mamun Madaser	Habinteg
91	Dwell Developments Limited – Land to the west of Moss Pit	Dwell Developments Limited
92	Michael Eld	Harrowby Estates
93	Sue Green	Home Builders Federation (HBF)
94	Seddon Homes - Land at Ash Flats, Stafford Town	Seddon Homes
95	Messrs Nickolls	Messrs Nickolls
96	Mr A Tavernor	Mr A Tavernor
97	Mr B Ivanovic	Ivanovic and Company Limited
98	Mr Jonathan Lloyd and others	Jonathan Lloyd Developments Limited (and other Landowners)
99	M J Barrett Group Limited	M J Barrett Group Limited
100	Gerald Willard	Gerald Willard Planning Consultant
101	Bloor Homes (Midlands) – Land at Eccleshall Road, Stone.	Bloor Homes (Midlands)
102	Lovell Homes in respect of Land at The Crescent, Doxey	Lovell Homes in respect of Land at The Crescent, Doxey
103	Richborough Estates (Land at Weston)	Richborough Estates

<b>104</b>	St Modwen Homes Ltd.	St Modwen Homes Ltd.
<b>105</b>	Legal & General Property	Legal & General Property
<b>106</b>	Bellway Homes – Land between Main Road and A51, Little Haywood	Bellway Homes
<b>107</b>	Ms Joanne Russell	Stoford Developments
<b>108</b>	Rentplus UK Ltd	Rentplus UK Ltd
<b>109</b>	McCarthy & Stone Retirement Lifestyles Ltd and Churchill Retirement Living	McCarthy & Stone Retirement Lifestyles Ltd and Churchill Retirement Living
<b>110</b>	Vistry Homes Limited	Vistry Homes Limited
<b>111</b>	Bellway Homes Ltd and John Alison Land & Research – Land south of B5026 Stone Road, East of Eccleshall	Bellway Homes Ltd and John Alison Land & Research
<b>112</b>	Ms N Wassall	Ms N Wassall
<b>113</b>	Matthew Weaver – Land to the south west of Stone Business Park	Hinson Parry and Co.
<b>114</b>	Colin and Pauline Hutchinson	Resident
<b>115</b>	Chris Boulton	Resident
<b>116</b>	Andrew Finney	Resident
<b>117</b>	James Cawdell	Resident
<b>118</b>	Douglas Webb	Resident
<b>119</b>	Sue Bramall	Resident
<b>120</b>	Ms Holland	Resident
<b>121</b>	Mr L Burns	Resident
<b>122</b>	Mrs Pauline North	Resident
<b>123</b>	Marc Hardenberg	Resident
<b>124</b>	Rob Pilling	Resident
<b>125</b>	Chris and Tress Smailes	Resident
<b>126</b>	David Holt	Resident
<b>127</b>	Paul Beardmore	Resident
<b>128</b>	JC Hinson	Resident
<b>129</b>	Mr B Wiseman	Resident
<b>130</b>	Mr Luke Sarjeant	Resident
<b>131</b>	Ms A Hindley	Resident
<b>132</b>	Mrs Beryl Whincup	Resident
<b>133</b>	Mrs E Marston	Resident
<b>134</b>	Hazel Charnah	Resident
<b>135</b>	Francesca Bramall	Resident
<b>136</b>	A Borgman	Resident
<b>137</b>	David J Allen	Resident
<b>138</b>	Joseph Johnson	Resident
<b>139</b>	M.W.T. Barlow	Resident
<b>140</b>	Richard Charnah	Resident
<b>141</b>	Susanna Munro	Resident

<b>142</b>	Hilary Jordan	Resident
<b>143</b>	John Jordan	Resident
<b>144</b>	Joseph M Craen	Resident
<b>145</b>	Mrs. L. Allen	Resident
<b>146</b>	C.H Bendall	Resident
<b>147</b>	Margaret Lannigan	Resident
<b>148</b>	John Lameris	Resident
<b>149</b>	Paul Luqman	Resident
<b>150</b>	Mrs Jean Moreland	Resident
<b>151</b>	Nina Cooke	Resident
<b>152</b>	Sally-Ann and Elisabeth McOwan	Resident
<b>153</b>	John and Celia Clements	Resident
<b>154</b>	Shane Phillips	Resident
<b>155</b>	Julia Lameris	Resident
<b>156</b>	Joanne Banks	Resident
<b>157</b>	Mr and Mrs B R Horton	Resident
<b>158</b>	Paul F. Windmill	Resident
<b>159</b>	Alison Tilsley	Resident
<b>160</b>	A Clark	Resident
<b>161</b>	Nigel Holmes	Resident
<b>162</b>	Beryl Metcalf	Resident
<b>163</b>	J R Prichard.	Resident
<b>164</b>	Maria Kalaga	Resident
<b>165</b>	MJH and JM Preston – land north of Trent Road, Stone	Resident
<b>166</b>	Christopher Dobbs	Resident
<b>167</b>	Robin Grime	Resident
<b>168</b>	Robert Hine	Resident
<b>169</b>	Mary Booth	Resident
<b>170</b>	Wojtek Kawecki	Resident
<b>171</b>	Jane Bonser	Resident
<b>172</b>	Julie Jackson	Resident
<b>173</b>	Lucy Welch	Resident
<b>174</b>	Pat Tweed	Resident
<b>175</b>	Tony Bonser	Resident
<b>176</b>	Alan Elliott and Carol Holte	Resident
<b>177</b>	Geoffrey White	Resident
<b>178</b>	Baxter Nigel	Resident
<b>179</b>	Catherine Gill	Resident
<b>180</b>	Mary Wilebur	Resident
<b>181</b>	Karen Davies	Resident



## Appendix 2: Detailed Analysis of Responses

Please note, throughout the following sections there are specific references to paragraphs in the National Planning Policy Framework (NPPF) 2019 version. Since the Issues and Options Consultation period, the NPPF was revised in 2021, so any specific paragraph references below may not match the same paragraph in the revised 2021 version.

### Section 1 – Introduction

A total of 50 responses were received in relation to questions 1.A and 1.B.

**Responses were received from the following respondents:** 5, 6, 7, 8, 12, 17, 19, 22, 29, 30, 32, 37, 38, 39, 41, 54, 57, 58, 59, 61, 64, 67, 68, 69, 70, 71, 74, 75, 76, 80, 81, 86, 87, 89, 92, 93, 100, 101, 102, 103, 106, 109, 110, 111, 112, 118, 119, 120, 180, 181

### Theme – Statements of Common Ground and Duty to Cooperate (DtC)

Additional Evidence Suggested	Stafford Borough Council Response
<p>The requirements of all other neighbouring local planning authorities which the borough has a functional relationship is explored and detailed within the local plan evidence base.</p> <p>Unmet need in both Staffordshire Moorlands and Stoke / Newcastle under Lyme plans and the DtC Statement (para 5.19) between Stafford and these authorities. It is suggested that the lack of any clear joint work, even at this early stage of the Plan’s development, is a clear omission both in terms of meeting development requirements and in establishing if a review of the North Staffordshire Green Belt is required.</p>	<ul style="list-style-type: none"> <li>• Noted.</li> <li>• Stafford Borough Council is in regular communication with all nearby authorities to ensure that the authority is fully appraised of their emerging Duty to Cooperate requirements.</li> <li>• In respect of most immediately neighbouring authorities, Stafford Borough Council has not been advised of the need to consider providing for additional housing or employment land within the borough.</li> <li>• The potential exception to this is in respect of the joint planning work at Stoke-on-Trent and Newcastle under Lyme where a shortfall in capacity has been previously identified but where issues with the supporting evidence to the request were identified.</li> <li>• The council has been notified of a shortfall in requirement by the Black Country Authorities. Discussions are</li> </ul>

	<p>currently ongoing to establish the extent of this unmet need and to establish the housing and employment links including migration and commuting. This will be achieved through an evidence-based approach.</p> <ul style="list-style-type: none"> <li>• Statements of Common Ground (SoCG) will be prepared for all key strategic matters including: <ul style="list-style-type: none"> <li>○ Where no unmet development requirement is identified a SoCG will be prepared to accompany the submission document.</li> <li>○ Where unmet need is identified a SoCG will be drawn up at the earliest opportunity to support the next stages of this local plan</li> </ul> </li> </ul>
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### Themes – Housing and Spatial Strategy

Additional Evidence Suggested	Stafford Borough Council Response
Household migration and commuting patterns between Stafford and the West Midlands local authorities	Noted.
Settlement Assessments – update the 2018 study to correctly identify the number of dwellings delivered in the settlements since 2011.	Noted and agreed. An updated Settlement Assessment to incorporate the latest position will be published by Stafford Borough Council to accompany the Preferred Option.
Urban Capacity Assessment	Noted and agreed. Stafford Borough Council will publish an updated Strategic Housing and Employment Land Availability Assessment to identify the amount of realistically available land for housing and employment at its main settlements to accompany the Preferred Option.
Housing needs assessment for the Large Settlements to inform an evidence-based distribution of development	Disagree. The council does not believe it is possible to realistically and reliably disaggregate the key data sources, e.g. population projections, to enable this.
Site Selection Methodology	Noted and agreed. A Site Selection methodology has been produced to guide the selection of sites for the Preferred Option.
Settlement Boundary methodology	Noted and agreed.

	A Settlement Boundary methodology has been prepared and used to guide the selection of sites for the Preferred Option.
Deliverability of existing commitments	Noted and agreed. In establishing the contribution to the local plan the deliverability and rate of delivery of existing allocations will be considered. Additional allocations will be made to ensure a realistic 5-year land supply through the life of the new plan is maintained.
Review of the North Staffs Green Belt	Disagree. The council does not believe that the necessary exceptional circumstances exist to justify a review of the North Staffordshire Green Belt
Clarification of any potential conflict of interest with regard to some of the proposed sites. Suggested that maps and plans showing the County Council's agricultural holdings in relation to the proposed plan are provided.	Noted. All landowners, public and private sector, are able to propose land for development via the "Call for Sites" process. These sites are then assessed for their suitability for development and published, with associated mapping, in the borough's Strategic Housing and Employment Land Availability Assessment (SHELAA) document. The latest version of the SHELAA was published in August 2022. The sites that are included in this version of the SHELAA form the pool from which potential sites for development were drawn and subjected to further assessment prior to their proposal for allocation.
Self-Build demand study (not just SB register)	Noted and disagreed. The necessary evidence is provided by the council's Self Build Register, so no further studies are required.
Regarding the government's Accessibility and Wheelchair Housing Standards: a thorough assessment of need and viability which tests the impact of the introduction of these standards	Noted. However, please note, some of this information is provided by the Economic and Housing Development Needs Assessment (EHDNA) and the Staffordshire County Extra Care Strategy.

## Theme – Employment and Economy

<b>Additional Evidence Suggested</b>	<b>Stafford Borough Council Response</b>
How the changes would affect existing industries (e.g. Farming)	Noted. This is a challenging, potentially wide-ranging and expensive piece of work.

## Theme – Sustainability Appraisal, Climate Change, Environment and Health

<b>Additional Evidence Suggested</b>	<b>Stafford Borough Council Response</b>
Strengthen Sustainability Appraisal (SA) for future rounds	Noted and agreed. An interim Sustainability Appraisal will be published to support the Preferred Option.
SA monitoring indicators could include specific reference to the biodiversity losses and gains	Noted. The Sustainability Appraisal will identify appropriate indicators.
Strategic Development Options study should consider the contribution to carbon neutrality more explicitly and quantify the expected outcomes from each option	Noted. As the evidence base and borough's Climate Change Mitigation Strategy has been developed this issue will be increasingly incorporated into the preparation of the local plan.
Stage 2 Flood Risk Assessment	Noted. It is intended that no sites in Flood Zones 2 and / or 3 will be selected for development. As a result, a Stage 2 Flood Risk Assessment will not be required for the local plan. Where a proposal for a large development incorporates some Flood Zone 2 and / or 3 these will be considered as part of the Borough's Green and Blue Infrastructure assets.
Water Cycle Study	Noted. A Water Cycle Study will be published following the Preferred Option.
Landscape Appraisal	Noted and agreed. A Landscape Appraisal has been prepared and used to guide the selection of sites for the Preferred Option.
Heritage Assessment	Noted and agreed. A Heritage Assessment has been prepared and used to guide the selection of sites for the Preferred Option.

Update of Stafford Borough Council Historic Environment Assessment (SBHEA)	Noted and agreed. A Heritage Assessment has been prepared and used to guide the selection of sites for the Preferred Option.
Inter-relationship between Stafford Borough Nature Recovery Network (NRN) mapping, SA, Habitat Regulations Assessment (HRA) and assessment of spatial options not apparent	Noted. The preparation of the local plan will consider all aspects of the available evidence. In part some of these specific issues have been addressed by the published Ecology Assessment.
Known designated sites and important habitats have been mapped within the evidence base but are not comprehensive and require ongoing work to keep them up to date	Noted and agreed. An Ecology Assessment has been prepared and used to guide the selection for sites at the Preferred Option.
Need for biodiversity net gains and the scale of net gain specified in the Plan	Noted. Ongoing work associated with the local plan will reflect provisions in the Environment Act 2021 including local nature recovery strategies.
Cannock Chase Area of Outstanding Natural Beauty (AONB) Management Plan, and its supporting documents, which provide a strategic context for the AONB, should be used to inform the evidence base for the Development Plan.	Noted and agreed.
Green Space Audit	Noted. This will be incorporated into the Open Space Assessment and Strategy.
Green Infrastructure Strategy	Noted and agreed. Green Infrastructure and strategic aims are being considered as part of the Biodiversity and Nature Recovery Network Strategy which will be prepared ahead of Submission.
Open Space Assessment and Strategy	Noted and agreed. As part of the local plan evidence base, an Open Space topic paper has been produced to support the Preferred Option. Additionally, an Open Space Assessment and Strategy is under preparation.
Update of Playing Pitch Strategy and Sports Facilities Strategy to take account of development proposals	Noted and agreed. The Playing Pitch Strategy has been updated to take account of development proposals.

Health Impact Assessment	Noted. The use of Health Impact Assessments has now been incorporated into the Community Impact Assessment (CIA). An initial CIA will be prepared to accompany the Preferred Option which will be adjusted to accompany the Submission (Regulation 19) document.
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### Theme – Waste and Minerals

<b>Additional Evidence Suggested</b>	<b>Stafford Borough Council Response</b>
Potential for expanding the local provision of aggregate for construction purposes	Noted Stafford Borough Council is working with Staffordshire County Council on these matters.

### Theme – Transport and other Infrastructure

<b>Additional Evidence Suggested</b>	<b>Stafford Borough Council Response</b>
HS2 Ltd offered technical support to the council in terms of its plans for an integrated station in Stafford and, if appropriate, the Stafford Gateway proposal.	Noted. The council has regular engagement with HS2.
<ul style="list-style-type: none"> <li>• Transport – Existing and future Walking and Cycling infrastructure.</li> <li>• Transport network assessment</li> <li>• Transport Needs Analysis</li> <li>• Integrated Transport Strategy</li> <li>• Strategic Transport Assessment</li> <li>• Sustainable Transport and Public Transport measures and connectivity</li> </ul>	Noted. Stafford Borough Council is working closely with Staffordshire County Council on these matters.
Electricity networks capacity and potential for renewables	Noted. Stafford Borough Council is working closely with the energy providers to ensure there is sufficient capacity for proposed development.
Potential Renewable energy potential and locations assessment	Noted and Agreed This work be developed alongside the Climate Change Mitigation Strategy and evidence produced by the Staffordshire authorities.
Sewerage system capacity	Noted. Stafford Borough Council is working closely with Severn Trent Water to

	ensure there is sufficient capacity for proposed development.
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**Theme – Viability and Delivery**

<b>Additional Evidence Suggested</b>	<b>Stafford Borough Council Response</b>
Whole Plan Viability Assessment – to include specific consideration of Viability of Older Persons Housing	Noted and Agreed A Stage 1 study has been prepared to support the preparation of the Preferred Option and a more detailed report will accompany the publication of the Submission document.
CIL Viability Study	Noted and Agreed A Stage 1 study has been prepared to support the preparation of the Preferred Option and a more detailed report will accompany the publication of the Submission document.
Infrastructure Delivery Plan	Noted and Agreed An Infrastructure Delivery Plan has been published alongside the Preferred Option, which will be amended in due course to accompany the Submission document.

## Section 3 – Vision and Objectives

### 3.A) Do you agree that the vision should change?

Response	Count
Agree / Yes	47
Disagree / No	5
Other Comments	2
No view expressed	127
<b>Total</b>	<b>181</b>

**Responses were received from the following respondents:** 3, 7, 11, 14, 17, 19, 22, 24, 28, 29, 33, 34, 36, 37, 39, 41, 49, 54, 57, 61, 63, 66, 67, 68, 69, 70, 71, 74, 75, 76, 77, 80, 81, 83, 85, 86, 87, 89, 91, 92, 100, 101, 102, 103, 110, 112, 113, 116, 118, 119, 162, 165, 168, 181

### Summary of Responses

There was a broad consensus amongst those expressing a view that the vision should be changed. Key issues cited included:

- The need to fully recognise the National Planning Policy Framework (NPPF) and how the borough will achieve sustainable development as the key planning objective.
- The need to recognise the changed context from the preparation of the adopted Plan for Stafford Borough 2011-2031.
- Commitment to promoting and realising the opportunities that will flow from Stafford Station Gateway, i.e. HS2, and a Garden Community at Meecebrook.
- The need to acknowledge the role of settlements other than Stafford and Stone. The roles of Eccleshall and other larger settlements and smaller settlements should be recognised.
- To be clearer and more succinct in respect of what the borough is setting out to achieve in the new plan period.
- To better express how the opportunities arising from the housing and employment requirements and the distribution will be addressed.
- Strengthen references to the natural environment and the need to respond to climate change.
- The vision should inspire, not say “how to”.
- Additional explicit themes for the vision proposed include:
  - Borough-wide tourism opportunity.
  - Emphasise the development and delivery of high-quality housing, including affordable housing.
  - The need to respond to a wide range of housing requirements in the new plan period including for older people.
  - The need to protect the most valuable assets in the borough including landscapes and wildlife habitats.



- The need to ensure new development is planned in a way to enhance the overall quality of the borough.
- Specific recognition of the role of the historic environment in the borough and its economy.
- The continuing role of the Ministry of Defence (MOD) in the borough.

Those not supporting a changed vision, considered that the current vision met the needs of the borough with some saying that, whilst it was long, it covered the necessary issues.

### **Stafford Borough Council Response**

Stafford Borough Council recognises that the vision should be redrafted to take account of the latest National Planning Policy Framework and other issues. A revised vision will be proposed as part of the Preferred Option consultation.

### **3.B) Do you agree that the vision should be shorter?**

<b>Response</b>	<b>Count</b>
Agree / Yes	33
Disagree / No	2
No view expressed	146
<b>Total</b>	<b>181</b>

**Responses were received from the following respondents:** 3, 11, 17, 19, 22, 24, 27, 29, 33, 37, 41, 54, 66, 74, 75, 76, 77, 80, 81, 85, 86, 87, 91, 92, 100, 101, 102, 103, 110, 112, 119, 162, 165, 168, 181

### **Summary of Responses**

There was a broad consensus amongst those expressing a view that the vision should be shorter. Key points included:

- A shorter and more focused vision may be desirable, provided that is able to articulate the priorities and approaches that the local plan must deliver over the plan period.
- The need to repeat the emphasis of the current vision on the development and delivery of high-quality housing within the borough, including affordable housing. However, this should be clearer that this will be at a variety of locations, and on sites of varying scale, including small sites, so as to fully meet the Local Housing Need.
- It was proposed that the vision could be made shorter through the removal of the sub-sections for both Stafford and Stone and a strengthened role for neighbourhood plans across the Borough.

## Stafford Borough Council Response

Stafford Borough Council recognises that ideally the vision should be shorter, more succinct and direct. Equally the council is keen to ensure that the vision is not “dumbed down”. A revised vision will be proposed as part of the Preferred Option consultation.

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

Response	Count
Agree / Yes	34
Disagree / No	0
No view expressed	147
<b>Total</b>	<b>181</b>

**Responses were received from the following respondents:** 3, 12, 17, 19, 22, 24, 27, 29, 33, 37, 38, 39, 41, 54, 66, 74, 75, 76, 80, 81, 86, 87, 92, 100, 101, 102, 103, 112, 119, 127, 162, 166, 168, 181

### Summary of Responses

There was a strong consensus amongst those expressing a view that there should be a more explicit approach to climate change in the new vision. Suggestions made included:

- In the light of the revised NPPF and increasing emphasis on climate change, with the UK Parliament having declared a climate emergency in May 2019, and Stafford Borough Council’s similar declaration it is appropriate for the vision to more explicitly recognise the need to respond to climate change.
- Strong support for an explicit vision to respond to the climate crisis as a central function of the local plan.
- The implications of climate change for emerging policy to be contained within a new local plan should be informed by the council’s Climate Change Strategy. The local plan’s approach to Climate Change should be based on and reflect the council’s corporate stance on the issue.
- A new vision must recognise the importance of climate change and its consequences, this should be explicit in the Plan taking a proactive approach to mitigating and adapting to climate change, rather than just responding to the consequences. See paragraph 149 of the NPPF. This is clearly reflected elsewhere in the Plan but needs to be consistent throughout.
- This is more than simply recognising the need to respond to climate change, the plan is a policy mechanism to tackle climate change now and in the future. Within the plan period it will not be adequate to simply recognise that climate change is happening and requires a response. The plan needs to facilitate

actions to tackle climate change as part of the Council's Climate Change Strategy / Action Plan and to meet government targets.

- The vision needs to include a strong commitment to minimising, adapting to, and mitigating the effects of climate change. The vision should not commit to growth beyond environmental limits.
- Support for more specific mention of nature-based solutions to climate change, in line with the aspirations within the 25 Year Environment Plan. Specifically, resilient ecological networks, recognition of ecosystem services such as flood management and soil conservation, and the restoration of wetlands, peatlands and woodlands.
- The role of the planning system in tackling both the climate and nature emergency was highlighted and the need for the vision to reflect these. The current vision can be strengthened to promote the conservation of priority sites, habitats and species, and ecological networks. This would reflect the 25-year Environment Plan targets for growing and resilient ecological networks, richer in wildlife, and the requirements of the NPPF (e.g. paragraph 174).
- The NPPF requires strategic policies to take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, water supply, biodiversity and landscapes. It also states that policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts.
- It was suggested that the new vision, therefore, should adopt similar terminology around climate change mitigation, adaptation and resilience measures and consider the range of issues highlighted in the NPPF.
- One response suggested that some specific targets should be encapsulated in the vision, with examples given:
  - Ensure all new housing is carbon neutral by 2040.
  - Increase number of electric charging points from X to Y.
  - Increase length of off-road cycle trails from X to Y.
  - Achieve 95% recycling.
- It was suggested that the local plan should take a bold and pro-active approach in ensuring that the design, specification and conditions of use of new, re-furbished and adapted buildings incorporate the most efficient and effective energy saving, energy use and energy management technologies and equipment, as well as ensuring that such buildings are resilient to the extreme weather events that are likely to result from climate change. Similar approaches should be used where development does not involve buildings, e.g. sustainable drainage systems for open storage or car parking, energy efficient lighting systems.
- A small minority of respondents suggested that there is an irreconcilable tension between the need to respond to Climate Change and its consequences and the 'business as usual' perpetual growth scenario.

- One response alluded to a perceived lack of council understanding of Sustainable Development (reflected by the Corporate Business Plan and draft local plan) and that the council should return to the approach encapsulated in its own Local Agenda 21 Strategy (2001) which showed leadership, vision and clarity of understanding of the meaning of sustainable development.

### **Stafford Borough Council Response**

Stafford Borough Council recognises the strong response that Climate Change should be directly addressed in the vision. This will be reflected in the new vision to be consulted on at Preferred Option stage which will accord with the council's Climate Change and Green Recovery Strategy 2020-2040.

### **3.D) Should the spatially based approach to the Objectives be retained?**

A total of 46 responses were received in relation to this question.

**Responses were received from the following respondents:** 1, 3, 6, 7, 10, 11, 17, 22, 24, 29, 33, 36, 37, 39, 54, 56, 58, 66, 67, 68, 69, 70, 71, 74, 75, 76, 80, 81, 86, 87, 92, 101, 102, 103, 106, 110, 111, 112, 113, 119, 126, 162, 165, 166, 168, 181

### **Summary of Response**

There was a mixed response as to whether the spatially based approach to the objectives should be retained or not. Suggestions made included:

- Whilst a spatially based approach to the objectives is helpful, in particular, in clarifying what is required in certain locations, there is scope to produce a condensed schedule of objectives which can make specific locational references, as required, for example, if there is a need to accommodate returning military personnel in Stafford but not elsewhere. This approach would ensure that the objectives were clear and remove duplication or ambiguity where similar objectives have been expressed differently in different locations.
- There are a significant number of objectives in the adopted plan. The local plan provides an opportunity to review, refine and consolidate the number of objectives. However, the number of objectives required is likely to depend on the overarching vision for the new Plan and whether the council decides to adopt a spatially based approach to setting its objectives or a more general approach to borough wide objectives.
- A spatially based approach to the Objectives may be appropriate as a matter of principle. However, it may be necessary for the council to review which parts of the borough are addressed by the objectives and amend those objectives having regard to the preferred spatial strategy to be set out in the new Plan.

- There was agreement that the current spatial-based approach does lead to some duplication of objectives. However, it may be possible to address this and avoid unnecessary repetition by identifying a series of 'overarching' objectives which are common across the entire borough.
- One respondent considered the 28 key objectives contained within the adopted local plan to be protracted and repetitive. This is, in part, due to the spatially based approach previously taken by the Borough Council. The review provides an opportunity to distil elements of the current objectives that remain relevant to the borough, into a concise set of borough-wide objectives.
- The Key Objectives for Stafford within the adopted Plan for Stafford Borough (2011-2031) include reference to the supporting the role of public sector organisations who have a significant presence in the town, including the Ministry of Defence. The MOD support this recognition and would like to see similar support within the new local plan, whether in the form of a new Key Objective, or contained within another section / policy within the plan.
- Key objectives (#21-28) for settlements outside Stafford and Stone were suggested to not be high-level objectives and a degree of planning judgement needs to be applied based on the varying characteristics and size of each settlement in the borough.
- Smaller settlements other than Stafford and Stone have important roles and contributions to make to future growth. They should be given the opportunity to grow and adapt in line with modern times in order to remain sustainable but with consideration given to the important history of the settlements.
- There was some dissent from the spatially based approach taken to the objectives as each settlement should be adequately assessed through the formulation of the emerging local plan, through the suitable examination of evidence base documents and consideration of consultation responses.
- To remove a spatial element from objectives would risk producing generic and conflicting thematic objectives that do not recognise the differing development needs across the plan area or the settlement hierarchy.
- Objectives applying to all spatial areas should be captured under borough wide objectives, which are likely to reflect the growing need for cross cutting theme-based objectives. Building on these would be distinct objectives that would apply to specific areas, these would be used to define how the overarching objectives would apply to the different districts identified, using the evidence base.
- If the evidence base feeds into the development of plan objectives correctly there should be no need for duplication, as each objective is specific to the area to which it applies.
- The spatially based approach does lead to duplication. It was proposed that the objectives / themes should clearly aim to protect and enhance the natural environment, providing net gain for biodiversity, considering opportunities to

enhance and improve ecological connectivity, green infrastructure and respond to the challenges of climate change.

- As supported in the Habitats Regulation's Assessment – Issues and Options (January 2020) Report paragraph 3.21 on page 25, the objectives should deliver multiple benefits to the natural environment for health, economic and social well-being.
- The protected landscapes of the Area of Outstanding Natural Beauty (AONB) are a critical part of the borough's rich natural environment. In defining the new vision and key objectives, there should stronger reference to conserving and enhancing Cannock Chase AONB, and it's setting, for its landscape and natural beauty and the services it provides indirectly as a result of its special qualities. This would be appropriate and warmly welcomed.

### **Stafford Borough Council Response**

Stafford Borough Council recognises the potential for duplication caused by the spatially based approach. However, the "fine grain" approach facilitated by this method is has value due to the Borough's component areas. The council will consider the most effective approach his approach can be retained whilst at the same time reducing the current duplication. A revised set of objectives will be proposed as part of the Preferred Option.

### **3.E) Is the overall number of Objectives about right?**

A total of 15 respondents made representations in respect of this issue.

**Responses were received from the following respondents:** 17, 19, 39, 54, 56, 66, 74, 75, 76, 80, 86, 101, 102, 103, 119

### **Summary of Responses**

Very few responses directly answered this question, although there were two general consensuses, that there were too many objectives, or that, so long as the appropriate matters were covered, the absolute number of objectives was immaterial.

### **Stafford Borough Council Response**

Stafford Borough Council recognises that the approach to objective setting has scope for streamlining. A revised set of objectives will be proposed as part of the Preferred Option.

### **3.F) Should there be additional Objectives to cover thematic issues? If so, what should these themes be?**

A total of 35 respondents made representations in respect of this issue.

**Responses were received from the following respondents:** 3, 13, 17, 22, 24, 27, 29, 34, 38, 39, 41, 54, 64, 67, 68, 69, 70, 71, 74, 75, 76, 80, 86, 92, 100, 101, 102, 103, 109, 110, 119, 127, 162, 166, 168

### **Summary of Response**

Relatively few responses were made to this question but those that were made were typically fairly detailed and revealed a diverse view, though the positive use of thematic objectives was explored by a number of responses:

- The objectives are vague, woolly, unquantified and largely unmeasurable. Making them thematic would not help.
- Cross cutting themes should be identified and used to formulate objectives that would apply across the plan area. For example, climate change is a theme that would impact on a number of objectives and can only be tackled effectively if addressed 'across the board'. This approach can also promote creative thinking and reveal multiple benefits that are not obvious when themes are kept separate. Climate change action often focuses on energy, transport and building design, but when applied to landscape and Green Infrastructure there are less obvious solutions. For example, restoring peat soils helps sequester carbon, but also preserves soil structure, helps with flooding and increases biodiversity. A well-evidenced and balanced sustainability appraisal should be the starting point for embedding cross-cutting themes, so that the resulting policies interact well and are easy and effective to apply.
- Climate Change should have its own thematic objectives in order to ensure that climate change objectives and commitments to net zero are truly embedded in the planning process and not side-lined for expediency. The objectives set on climate change would provide a defined and measured way to assess the impact of the local plan and any subsequent growth and building, through a climate lens.
- There should be a specific objective for the historic environment and its opportunity to respond to an economic drive as well as responding to the needs of climate change. The retention and re-use of historic buildings is both a benefit for heritage tourism and the challenges of climate change. The respondent suggested the Plan provides a positive strategy for the historic environment that is embedded into the local plan.
- Transport, broadband and telephony are hardly mentioned, especially in the rural areas where they are most important. Recommendation that 'communication' is a thematic issue that needs its own objectives as it is poorly covered in the objectives as proposed.
- Need for a thematic new policy to specifically cover small village sites and sites adjacent to existing settlement boundaries to allow for provision of affordable and self-build homes. Presumption for development should be

approved providing the authority and landowners can work together to provide land to accommodate these homes thereby adding supply to a much neglected and needed sector.

- A few respondents did not support the preparation of additional objectives but the reconsideration of the existing objectives, with the suggestion that updated objectives should include:
  - An approach to spatial distribution of growth to support sustainable communities
  - Meeting housing needs
  - Economic growth requirements
  - Infrastructure delivery
  - Range of locally relevant thematic topics that would include climate change, centres, leisure, heritage, ecology, landscape and the creation of high-quality new development.

### **Stafford Borough Council Response**

Stafford Borough Council welcomes the positive suggestions for the use of thematic objectives and will carefully consider their applicability as part of the new set of objectives that will be proposed through the Preferred Option consultation.



## Section 4 – Sustainability and Climate Change

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

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

<b>Response</b>	<b>Count</b>
Agree / Yes	21
Disagree / No	22
Other Comments	11
No view expressed	127
<b>Total</b>	<b>181</b>

**Responses were received from the following respondents:** 3, 6, 8, 10, 11, 14, 17, 19, 22, 27, 28, 29, 33, 37, 38, 41, 49, 54, 56, 57, 58, 61, 64, 66, 74, 75, 80, 81, 86, 87, 91, 92, 93, 94, 100, 101, 102, 103, 104, 106, 111, 112, 115, 119, 120, 126, 127, 162, 165, 166, 168, 174, 177, 181

Please note, not all respondents listed above responded to both 4.Aa and 4.Ab.

### Summary of Responses

On this matter there was a clear divergence of views for the council to consider.

Those in support, expressed the following points:

- Commonly referenced was the climate change agenda in general, the council's own Climate Emergency statement and the urgency of the situation. In doing so they referred to a range of approaches that the council might wish to bring into policy with those referred to including car charging points, solar panels / storage, passive heat retention (e.g. triple glazing), passive heat gain by south facing new buildings, BREEAM / Passivhaus standards and the need to move away from gas boilers.
- One response went further and suggested that they would want to see mandatory installation of renewable energy systems in all development, such as PV, Solar Thermal, Geothermal / Ground source heating, Air source heating, or other technologies that may be available, and a requirement for local sourcing of aggregate wherever possible (this latter step will require adjustments to the minerals plan).
- For large / strategic sites, on-site heat generation and distribution should be encouraged by the council.
- A number of respondents suggested to the council that whilst the consideration of Building Standards, water efficiency, etc. considered by

Section 4 was helpful a more holistic approach was required so that the most sustainable development options and Carbon Neutrality can be achieved.

- One respondent said in their view, statutory building regulations are inadequate and that all newly constructed properties in the borough should be, wherever possible, as efficient as technologically available at the time of construction

Those against, expressed the following points:

- Today's new homes are very energy efficient with lower heating bills compared to older homes.
- A number of developers support moving towards greater energy efficiency via a nationally consistent set of standards and a timetable for achieving any enhancements, which is universally understood and technically implementable.
- One respondent acknowledges that the government has not enacted its proposed amendments to the Planning and Energy Act 2008 to prevent the council from stipulating energy performance standards that exceed the Building Regulations but consider that the council should comply with the spirit of the government's intention of setting standards for energy efficiency through the Building Regulations. It is their opinion that the council should not be setting different targets or policies outside of Building Regulations.
- A number of responses specifically referred to the "Future Homes 2025" approach and suggested that this should provide the future template.
- It was suggested that the key to success is standardisation, rather than every council in the country specifying its own approach to energy efficiency, which would undermine economies of scale for product manufacturers, suppliers and developers.
- Where any deviation from the national standards is intended, it was highlighted by a number of respondents that this will need to be properly evidenced, as some suggest there has been no evidence provided by the council that such a requirement would be feasible or achievable.
- Small scale developments should not be over-burdened with obligations leading to lack of viability.

Other points raised related to:

- The enforcement of current policy by the council was seen as weak.
- The encouragement of cycling for leisure and commuting thereby reducing car usage and the need for safe roads to encourage this.
- The pattern of development required to take account of future live / work patterns (e.g. larger houses and gardens to encourage home workers, multi-generational family living, etc).

- In areas vulnerable to flooding ensure design and construction is appropriate (e.g. 1st floor living, waterproof plaster, high level electricity points, flood proof doors).
- The need to encourage tree planting and the wider natural environment as a climate resilience measure in new developments and in the wider context. In this connection the Woodland Trust suggested that the borough should introduce a target of 20% for the tree canopy and that for every new dwelling an additional tree should be planted.
- The Plan should contain policies that require biodiversity to be designed into the built environment.
- One respondent suggested the mandatory installation of renewable energy systems in all development and a requirement for local sourcing of aggregate wherever possible.

### **Stafford Borough Council Response**

The local plan and its constituent policies have been prepared in light of Stafford Borough Council's Climate Change and Green Recovery Strategy 2020-2040 and the Staffordshire County Council Climate Change Adaptation and Mitigation study.

The council is keen to ensure that the highest possible build and water standards are achieved, but similarly recognise:

1. The evidence requirements necessary to justify such an approach;
2. The concerns expressed in respect of the impact of standards in excess of those required by building standards on the viability of development.

The proposed approach to these matters will be detailed in documents as part of the local plan initially through the Preferred Option.

### **4.B) Which renewable energy technologies do you think should be utilised within the borough, and where should they be installed?**

A total of 32 responses were received for this question.

**Responses were received from the following respondents:** 3, 8, 17, 19, 22, 25, 27, 29, 34, 37, 39, 54, 64, 67, 68, 69, 70, 71, 80, 86, 92, 100, 112, 119, 120, 127, 162, 165, 168, 174, 175, 181

### **Summary of Responses**

A variety of views were expressed in this matter with views typically referring to the nature of development and the form of renewable energy. No clear consensus of views emerged.

The following forms of renewable energy were suggested:

- More solar panels and storage for housing and public buildings need to be installed, especially given the expected large-scale switch to electric vehicles.
- The Plan needs to facilitate large-scale installation of solar PV on commercial buildings for charging electric vehicles, e.g. by the council joining forces with Big Solar Co-op (<https://bigsolar.coop/>).
- Ground and air heat source pumps especially large buildings.
- At a house-by-house level, personal solar and wind developments as well as ground source heat pumps should not only be permitted but encouraged.
- Onshore wind for industrial developments wherever suitable and away from housing.
- All council owned vehicles should be converted to run on zero-emission bio-methane produced in anaerobic digesters.
- A small number of respondents highlighted that the renewable energy market is developing rapidly as is the research and development into new sustainable and renewable energy sources. This led to the suggestion that any new policy framework should avoid specifying the exact type of energy production technologies to be deployed within developments but instead should encourage flexibility in anticipation of this dynamic and rapidly changing market. For example, in the long run, hydrogen power may be a more viable alternative than electricity to drive vehicles, as such policies in the new local plan should not preclude this alternative.
- Similarly, a small number of responses suggested that policy should acknowledge that appropriate techniques will vary according to the particular scale, location and content of development. Therefore, it is not appropriate to prescribe these matters in policy.

In terms of the nature of development it was suggested that:

- The first priority is to ensure energy savings through design. The more energy saved then the fewer requirements there will be for renewable energy or any other energy. Measures such as super-insulated properties, Passivhaus, and similar initiatives to reduce energy consumption should be evaluated.
- All residential development should include vehicle charging points.
- All options for renewable energy need to be considered with the implications for the natural and historic environments in mind.
- Opportunities to realise multiple benefits need to be identified, such as installing generation plants where biodiversity net gain can be achieved and helping to diversify farm incomes and support sustainable farming. Examples cited included:
  - Solar farms where landscape / visual and network connections allow, and near to communities that need them. These can provide excellent opportunities for grassland and heathland creation, although they

impact negatively on ground nesting farmland birds. Therefore, site location and design need to consider appropriate mitigation to achieve net gains for nature. Explore opportunities for solar panels on large buildings and in car parks.

- Wind turbines at suitable sites avoiding visual and ecology constraints following best practice guidance. Mapping of constraints and opportunity areas would be useful, as well as standards for landscape and ecology enhancement.
- Anaerobic digestion plants to create green gas from waste or energy crops, where there is sufficient transport infrastructure.
- Ground source, wind and solar farms to be combined with grazing livestock
- The National Farmers Union (NFU) stated support for small scale renewable energy in rural areas. This could include a range of technologies such as solar, anaerobic digestion, biomass and small-scale wind. As their work on achieving net zero evolves, more information on the part local farms can play will become available.
- Large scale technologies such as wind farms, solar farms, and biogas installations, should be installed on brownfield sites, land of poor quality, or nearby to sites with high rates of energy consumption.
- There is an issue with grid connectivity around Stafford, which is negatively impacting the economics of renewable energy schemes and deeming them unviable. Network upgrades could be achieved through CIL and S106 funding, which would provide much greater opportunity for renewable energy schemes to be implemented.

#### Caveats:

- Any strategy for renewable energy technologies, including wind energy developments, should take full account of the capacity of the natural environment to accommodate the energy infrastructure. When siting renewable energy technologies, they should avoid adverse impacts on designated sites and landscapes. This should include cumulative landscape and visual impacts.
- Historic England stated appropriate consideration should be given to the requirements for renewable energy generation and the protection of heritage assets, e.g. wind turbines in the setting of heritage assets or solar panels on listed building may be inappropriate, and potential harm to the significance of heritage assets needs to be considered. It will not be inappropriate in all cases, but the council will need to consider this issue and provide an evidence base for its policy direction.
- Natural England expects the local plan to consider the strategic impacts on water quality and resources (NPPF para 170). They would also expect the plan to address flood risk management (NPPF para 155-165).

- The local plan should contain policies which protect habitats from water related impacts and where appropriate seek enhancement. Priority for enhancements should be focussed on European sites, Sites of Special Scientific Interest (SSSIs) and local sites which contribute to a wider ecological network.
- Plans should positively contribute to reducing flood risk by working with natural processes and where possible use Green Infrastructure policies and the provision of Sustainable Drainage Systems (SUDs) to achieve this.

### **Stafford Borough Council Response**

The local plan and its constituent policies have been prepared in light of Stafford Borough Council’s Climate Change and Green Recovery Strategy 2020-2040 and the Staffordshire County Council Climate Change Adaptation and Mitigation study.

Stafford Borough Council will ensure that as much renewable energy is generated as possible locally and at an appropriate scale based on the appropriate evidence, whilst also exploring the potential economic opportunity offered by renewable technologies especially on brownfield land and in the borough’s rural areas. The council also recognises that there is not a one-size-fits-all solution, and that the policies should not be overly restrictive thereby potentially excluding emerging or future technologies.

The council recognises the concerns expressed in respect of the impact of renewable energy on the historic and natural environments, and landscape, and will seek to ensure a policy framework that accommodates these concerns is developed whilst at the same time encouraging the implementation of renewable energy technologies. The council also recognises that Climate Change and Sustainability are about more than renewable energy. A range of other issues raised in connection with this matter, e.g. flood mitigation via the natural environment, are addressed by other sections of the document.

#### **4.C) Should the council introduce a policy requiring large developments to source a certain percentage of their energy supply from on-site renewables?**

<b>Response</b>	<b>Count</b>
Agree / Yes	23
Disagree / No	12
Other Comments	1
No View Expressed	145
<b>Total</b>	<b>181</b>

**Responses were received from the following respondents:** 3, 8, 17, 19, 25, 27, 29, 39, 49, 54, 56, 58, 64, 66, 74, 75, 80, 86, 89, 91, 92, 94, 100, 101, 102, 103, 106, 110, 112, 119, 127, 162, 168, 174, 175, 181

## Summary of Responses

In common with the other elements of this section there was a marked divergence of opinion expressed, with the majority supporting the concept but others, usually on grounds of national guidance and viability, objecting to the concept.

Comments made in support of this concept included:

- That a policy requiring large developments to source a certain percentage of their energy supply from on-site renewables should have been incorporated in the current Plan and is an essential component of any local plan if large-scale developments are to address climate change.
- At least 30% of energy should be sourced from on-site renewables, including solar PV, heat pumps and district heating systems
- One response suggested that operating a percentage-based system on estimated power consumptions will be difficult to enforce and suggested that a target is set per square metre of space that can be heated.
- There is a significant benefit to the overall climate impact to the implementation of such a rule at a local level. However, this should only ever be in addition to higher standards for energy efficiency, insulation and design standards because these represent the “low hanging fruit” for delivering the borough’s zero carbon vision. In this context there should be a requirement for large scale developments, both non-domestic (above 1,000sqm) and domestic (10 units and above), to include an onsite provision for renewable energy generation which should provide at least 20% of the site’s energy needs. This should be focussed on the larger side of generation to ensure the economies of scale and efficiency, as well as long term viability and minimising maintenance on costs for the future.
- The Staffordshire-wide Climate Change joint study should help shape this policy area. Consideration should be given to ‘pathfinder’ allocations and / or broad areas on search to support any locational policies.
- This policy should be coupled with policies on sustainable design to reduce energy requirements as far as possible in the first instance.

Conversely there were some representations against this approach:

- Acknowledgment that the Planning Practice Guidance (PPG) supports the requirement for a proportion of energy used in developments to be from renewable sources, but there is no requirement for such provision to be ‘on-site’ (PPG reference ID: 6-012-20190315).
- The council was requested to provide further evidence which can demonstrate that a requirement for requiring on-site renewables on large scale developments can be justified along with examples of other policies or developments of such provision where this approach is workable and viable.

- In the context of this proposal, clarification was sought as to what was meant by “large scale development” and whether this was intended to coincide with the NPPF definition of “Major Development”, i.e. where 10 or more homes will be provided, or the site has an area of greater than or equal to 0.5 hectares).
- Again, there was reference by some respondents to not accelerate beyond requirements of building regulations without evidence to support that such requirements are deliverable and will not prevent the speedy delivery of housing in accordance with the aspirations of the NPPF.
- Additionally, it was raised that the ability for large developments to source a certain percentage of their energy supply from on-site renewables will need to be balanced with the burden of delivering other requirements to support the chosen spatial strategy, to ensure the delivery of sustainable communities.

Other Comments:

- One respondent, who didn’t express an opinion either way, did state that the council will require clear and robust evidence to justify the inclusion of any policy requirement in excess of statutory building regulations and will need to undertake viability testing to ensure that the policies are realistic and deliverable in line with the PPG.
- On-site renewables should only be required on sites where this is possible and not at the cost of the provision of open space or other infrastructure.

**Stafford Borough Council Response**

The local plan and its constituent policies have been prepared in light of Stafford Borough Council’s Climate Change and Green Recovery Strategy 2020-2040 and the Staffordshire County Council Climate Change Adaptation and Mitigation study.

The council is keen to ensure that as much renewable energy is generated as possible locally and at an appropriate scale, based on the appropriate evidence.

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

<b>Response</b>	<b>Count</b>
Agree / Yes	13
Disagree / No	10
Other Comments	3
No View Expressed	154
<b>Total</b>	<b>181</b>

**Responses were received from the following respondents:** 3, 6, 8, 17, 19, 22, 27, 29, 34, 39, 54, 64, 66, 67, 68, 69, 70, 71, 92, 100, 112, 119, 127, 162, 174, 175, 181



## Summary of Responses

Of all of the renewable energy technologies, terrestrial wind turbines are possibly the most contentious due to their visual impact and noise generation.

A number of representations were made in favour of wind energy, which included:

- Map 13 of the adopted Plan for Stafford Borough set out a number of locations which had “wind potential” within the borough and this provides a reasonable starting point for possible locations. There should be work done to identify locations which would be suitable for solar development as well across the borough, and the specific locations should be primarily focussed on what will provide the most efficient location for wind or solar energy without impacting directly on the areas of the borough of specific interest because of their biodiversity and conservation value.
- The present national position is that wind power generation is only possible on sites allocated in a local plan. It follows that if wind power is to form part of the energy mix for the borough, then sites will need to be allocated. The joint Staffordshire study should hopefully establish if there are any plausible locations within the borough to consider.
- The local plan should set out a vision whereby a wide range of renewable energy provision is within the envelope of what is permissible at a local level.
- In terms of large-scale development, the local plan should be open to development of both onshore wind and solar farms in locations across the borough, and the local plan should take a generally permissive approach to this type of development if it’s commitment to addressing climate change in the timescale which is required is to be taken seriously.
- One respondent suggested that onshore wind generation is one of the more cost-effective sources of renewable energy and as such, there is a case for the council to allocate such sites in order to contribute to the generation of clean energy and help combat Climate Change. No specific locations were proposed.
- It was suggested that wind farms should be located where they are the most effective for production, but also with the least effect on the resident population and ecology. Possibly the M6 corridor, industrial estates, or remote farmland.
- The need to assess the siting of energy generation plants and wind turbines on a case-by-case basis was recognised, although it was accepted that suitable locations for energy plants can be identified within the plan.
- One respondent considered that the borough has great potential for wind and solar energy and suggested that land at northeast of Stafford at Brickhouse / Beacon Farm has particular capacity for wind power generation and such potential would be incorporated into a Masterplan.

- Allocation of sites for a range of renewable, not just wind, would help 'front load' the system by picking suitable sites and avoid conflict at application stage. Locations should be identified based on gathering relevant data on site suitability and ecological constraints as per best practice guidance. Use of the Nature Recovery Network mapping evidence would assist in this.

Other more cautious representations considered the need for rigorous landscape assessments and consideration of potential impact of wind turbines. Statements included:

- Potential site allocation of wind energy developments would need to ensure full consideration of potential landscape and visual impact on the Cannock Chase AONB. Site selection should include assessment of landscape sensitivity and potential landscape and visual impact to avoid detrimental impacts on the setting of the AONB.
- Wind turbines should not be located where they compromise the rural landscape or character of Staffordshire. Small turbines in industrial areas should be acceptable.

Whilst a number of other responses were simply against the utilisation of wind power on landscape, visual intrusion or noise grounds. Another response suggested that solar PV with battery storage was a more efficient form of renewable energy.

### **Stafford Borough Council Response**

Stafford Borough Council notes the comments made in respect of this issue. The council will continue to ensure that as much renewable energy is generated as possible locally and at an appropriate scale, based on the appropriate evidence.

### **4.E) Should the council implement a higher water standard than is specified in the statutory Building Regulations?**

<b>Response</b>	<b>Count</b>
Agree / Yes	13
Disagree / No	18
No View Expressed	150
<b>Total</b>	<b>181</b>

**Responses were received from the following respondents:** 3, 8, 12, 14, 17, 19, 22, 24, 27, 39, 54, 57, 58, 66, 74, 75, 80, 81, 91, 92, 94, 100, 101, 102, 103, 104, 112, 166, 168, 174, 181

### **Summary of Responses**

Of the proposals contained in Section 4 of the Issues and Options document this was, overall, the least well supported.

Those in support of this concept commented:

- Climate Change could mean water resources become increasingly limited through the summer months. All encouragement of reduced usage and efficiency should be used. Rainwater harvesting should also be required for all developments / buildings over a certain size, and rainwater butts installed as standard on all new houses. This would also help to manage surface water run-off and flooding.
- Severn Trent Water (STW) were in favour of a tighter water efficiency target being applied and raised the point that the water resources zones which cover the borough, Stafford and North Staffordshire, have minimal water surplus with North Staffordshire being water stressed. STW further raised that they believe 80 litres per person per day is feasible without homeowners having to change their behaviour through using greater water saving appliances, fittings and greywater recycling for use in toilets.
- Examples of potential water efficiency measures were given:
  - Use waste-water recycling for irrigation purposes.
  - Rain-water collection to be mandatory for all developments for non-potable purposes.
  - Greater protection from agricultural run-off into the borough's waterways.
  - New developments should incorporate waste-water recycling and sustainable drainage systems (SUDS).

Conversely strong representations were made against this approach:

- One developer commented that, whilst it is commendable to deliver water conservation and efficiency, it is important that local planning policies do not accelerate beyond requirements of building regulations, particularly without evidence to support that such requirements are deliverable and will not prevent the speedy delivery of housing in accordance with the aspirations of the NPPF. Optional new national technical standards should only be required through any local plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the PPG. This evidence does not appear to be present.
- A number of representations directly referred to the necessary evidence requirements in order to justify such an approach. The policy approach should be informed by a Water Cycle Study to determine whether the scale, location and timing of planned development within the borough would give rise to issues from the perspective of supplying water and wastewater services and preventing deterioration of water quality in receiving waters.
- One representation stated that it is not clear what the rationale is for standards to be any different in Stafford Borough as opposed to the national approach used in the Building Regulations, and that the council appears to

have not fully recognised the technical feasibility and viability impacts that may be present. If such requirements were made through changes to the Building Regulations, wider consultation with built environment professions could take place, informing the formation of the regulations. It is not the place of the planning system to place more onerous requirements on areas usually regulated through the Building Regulations.

- A further representation citing the NPPF (paras 13,14 and 150b) suggested that no evidence had been presented to identify a “clear need” to go beyond the national technical standards, therefore there is no justification to go beyond them.
- Whilst a further representation requested the council to provide further evidence of the requirement for and workability of implementing a higher water standard than is specified in the statutory building regulation. In doing so, this would allow such provision to be “justified” as set out within paragraph 35 of the NPPF.
- Again, many respondents raised concerns about the lack of evidence as to whether the implementation of higher targets will be viable or not, with there needing to be evidence to demonstrate that sites will be able to come forward viably if all obligations are imposed.

Several representations sought to “bridge the gap” between these respective perspectives:

- One respondent stated that the local plan should require proposed developments to justify the approach they have taken in seeking to optimise water usage, with the statutory building regulations as a base point. There should not be a blanket requirement to exceed building regulations as this will not be appropriate in all cases. This might be pursued via a requirement for proposals to be supported by statements explaining and justifying the approach to water use efficiency, including considerations around viability.
- Another respondent explains that Part (b) of paragraph 150 of the NPPF states that “*any local requirements for the sustainability of buildings should reflect the government’s policy for national technical standards.*” Further guidance is provided in paragraph 13 of the PPG ‘Housing: optional technical standards’ which stipulates that “*the local planning authority may also consider whether a tighter water efficiency requirement for new homes is justified to help manage demand.*” Paragraph 14 of the PPG goes on to clarify that “*all new homes already have to meet the mandatory national standard set out in the Building Regulations (of 125 litres/person/day)*” but where “there is a clear local need” local planning authorities can set out policies requiring new dwellings to meet the tighter “*Building Regulations optional requirement of 110 litres/person/day*”.
- One respondent stated that no evidence has been published, to date, which identifies a “clear need” to go beyond the national technical standards.

Therefore, in order for any such policy to be considered 'sound' the council would need to provide evidence of a 'clear need' including:

- A Water Cycle Study
  - Consultation with local water and sewerage company, the Environment Agency and catchment partnerships
  - Consideration of the impact on viability and housing supply of such a requirement.
- One respondent was against the implementation of a higher standard than building regulations, but they did support the mandatory inclusion of greywater / storm water use for non-potable purposes in all new developments to both reduce the water consumption but also assist with the flood risks, by increasing water retention and storage, or water supply in drought conditions.

### **Stafford Borough Council Response**

The local plan and its constituent policies have been prepared in light of Stafford Borough Council's Climate Change and Green Recovery Strategy 2020-2040, the Staffordshire County Council Climate Change Adaptation and Mitigation study, the Water Cycle Study and other elements of the evidence base for the preparation of the local plan.

The evidence base for the local plan can be viewed here: [New Stafford borough Local Plan 2020-2040: Evidence Base Documents | Stafford Borough Council \(staffordbc.gov.uk\)](https://www.staffordbc.gov.uk/evidence-base)

The council is keen to ensure that the area's water resources are used in the most effective and efficient manner whilst also recognising the impacts of climate change on the available water resources. Prior to finalisation of the council's position on these matters the following will be undertaken:

- A Water Cycle Study.
- Consultation with local water and sewerage company, the Environment Agency and catchment partnerships.
- Consideration of the impact on viability and housing supply of such a requirement.

## Section 5 – The Development Strategy

### 5.Aa) Do you consider that the existing Policy SP1 addresses the requirements of the NPPF?

Response	Count
Agree / Yes	31
Disagree / No	6
No View Expressed	144
<b>Total</b>	<b>181</b>

Responses were received from the following respondents: 3, 17, 19, 22, 24, 26, 33, 54, 57, 58, 61, 66, 67, 68, 69, 70, 71, 74, 75, 76, 80, 81, 88, 89, 91, 92, 93, 94, 101, 102, 103, 110, 127, 162, 165, 168, 181

#### Summary of Responses

The vast majority of responses to this question were of a simple yes / no nature. However, a small number of comments were made, which are summarised below:

- There was strong criticism of the NPPF definition of “sustainable development”. This was based on:
  - The perceived lack of scope of the definition.
  - The emphasis on economic factors, the provision of development and proximity to main roads.
  - A perceived lack of emphasis on the more environmental and social infrastructure aspects of sustainability.
- One response specifically called for a return to the original definition of sustainable development. *“Development which meets the needs of current generations without compromising the ability of future generations to meet their own needs”* as defined in 'Our Common Future', also known as the Brundtland Report (1987)”
- One response suggested that a higher level of emphasis should be placed upon the environmental credentials of a development as opposed to its geographical location within the settlement hierarchy.

#### Stafford Borough Council Response

Stafford Borough Council notes that the current policy SP1 would meet the requirements of the NPPF if it were to be adopted in the new plan. The definition of sustainable development given by the NPPF has replaced the previous Brundtland-based definition for planning purposes, as such the definition used is encapsulated in national policy.

**5.Ab) Do you consider that it is necessary to retain this policy in light of the recent change in Planning Inspectorate’s view?**

<b>Response</b>	<b>Count</b>
Agree / Yes	21
Disagree / No	15
No View Expressed	145
<b>Total</b>	<b>181</b>

**Responses were received from the following respondents:** 3, 17, 19, 24, 26, 33, 54, 56, 57, 58, 61, 66, 67, 68, 69, 70, 71, 74, 75, 76, 80, 81, 88, 89, 91, 93, 94, 101, 102, 103, 106, 110, 162, 165, 168, 181

**Summary of Responses**

As with the previous question the vast majority of responses to this question were of a simple yes / no nature. Similarly, only a small number of comments were made. These are summarised below:

- Concern was expressed, should an equivalent policy not be retained, that there would there be less control over new development.
- The policy should be reviewed and updated to fully recognise the threats now being faced including the Climate Emergency and other key priorities relating to biodiversity, well-being and the need to support the development of a sustainable, future proofed economy. In essence a 'planet proofed' economy to deliver 'social, economic and environmental well-being'.

**Stafford Borough Council Response**

Stafford Borough Council recognises that the retention of an equivalent policy in the new plan might be seen to replicate NPPF. The council is also aware that a case might be made for the retention of an equivalent policy as a reminder to all involved in the planning process of the need to ensure the sustainability of development.

The council will consider this matter further and its proposed approach to this matter will be presented in the Preferred Option.

**5.Ba) Which Annual Housing Requirement figure do you think will best meet Stafford Borough’s future housing growth requirements?**

A total of 67 responses were made to this question.

<b>Economic Scenario</b>	<b>Count</b>
A	3
B	0
C	0
D	6
E	34
F	18

G	18
None of the above – Higher	1
None of the above – Lower	2
None of the above – Midpoint / Combination	3
Other Comments	11

Please note, the number of respondents favouring each Growth Scenario are recorded in the table above. Some respondents were in support of multiple economic scenarios (for example E, F and G) so these have been included for each scenario. As such the total number of responses in the table exceeds the number of individual respondents.

**Responses were received from the following respondents:** 3, 8, 10, 17, 19, 22, 24, 26, 29, 30, 33, 43, 47, 53, 55, 56, 57, 58, 59, 61, 62, 64, 66, 67, 68, 69, 70, 71, 74, 75, 76, 78, 79, 80, 81, 83, 85, 86, 87, 88, 89, 91, 93, 94, 97, 98, 99, 100, 101, 102, 103, 106, 110, 111, 114, 138, 156, 158, 161, 162, 165, 168, 169, 172, 175, 180, 181

### Summary of Responses

There was a fairly mixed response to this question, with overall there being strong support for Scenario E, with Scenarios F and G also receiving moderate support. A summary of the responses can be seen below:

- A number of responses referred to the uncertainty caused by the Covid-19 situation suggesting that it might be necessary to re-run the Economic and Housing Development Needs Assessment (EHDNA) utilising new assumptions arising as a result of any economic down-turn that results. Similarly, others countered this point by suggesting the Covid-19 will only impact on a small proportion of the plan period of 20 years so should not therefore hinder any growth intentions.
- The government are currently reviewing the housing methodology. This may well lead to the need to re-run the housing requirement calculations as and when the new methodology is released.
- General agreement that the government’s methodology has been correctly applied to achieve a “minimum” housing need for the borough (Scenario A, 408 dwellings per annum).
- Those arguing for Scenario A suggested:
  - It would be possible to accept additional housing on brownfield windfall sites above the baseline number.
  - If the council proposed a higher baseline number, it would have an adverse impact on the 5-year housing land supply.
- Others stated that Scenario A would represent a 20% reduction in the current housing requirement, suggesting that this would be unacceptable to government and would lead to an under-supply of housing in the borough.



- There was agreement amongst respondents that Scenarios B and C are not acceptable, although some stated that this rejection has the effect of inflating the perception of future housing requirement.
- Scenario D was supported by some as meeting the council's wish for growth by increasing population, by attracting 18,000 new migrants (net).
- It was suggested that Scenario D could include the Stafford Station Gateway, which was supported due to its more sustainable location and its development would reduce the loss of greenfield sites.
- Scenario D would support a new settlement at Meecebrook especially in its early stages with that development continuing well beyond 2040.
- A number of those responding suggested that the housing requirement should be no higher than A or D due to the impact of the scale of development on the character of the borough in recent years.
- Other respondents suggested that it was necessary to propose a higher housing requirement and that the existing evidence would support this.
- Recent housing delivery rates indicate that Scenario E is realistically achievable and accords with the government's housing growth agenda.
- Scenario F aligns with the more ambitious regeneration strategy including the Stafford Station Gateway project.
- Such an uplift in target would support the provision of greater numbers of affordable housing than currently, alongside employment and regeneration aspirations.
- One respondent felt that Scenario G represents an appropriate middle ground in respect of identifying a housing requirement, as this seeks to deliver growth above baseline estimates in terms of job creation. This would represent an increase when compared to the authority's current requirements but could be achieved in a sustainable way.
- It was suggested that a higher housing requirement should ensure that the full range of affordable housing needs are met, including specialist needs of the elderly, and affordable housing. Specialist housing and care for the elderly should have separate targets within the new local plan to ensure each are regularly monitored and reviewed so that any shortfalls can be addressed.
- One developer suggested, on the basis of their own consultant's work, that the housing requirement should be set between 750-870 dwellings per annum.
- Those detracting from suggestions of a higher housing requirement (Scenarios E, F and G) suggested that they are highly speculative, especially in light of the severe global economic recession that is likely to follow the 2020 coronavirus pandemic. Moreover, they are inconsistent with efforts to achieve net zero carbon emissions for the borough in the time frame 2020 to 2040.

## Other Related Issues:

- One respondent suggested that it should be considered how these growth aspirations can be delivered in the absence of delivery of a garden settlement at Meecebrook. The respondent suggested the projection of 5000 dwellings in the Plan period at a delivery rate of 500 dwellings per annum is unrealistic. Therefore, the trajectory needs to be more realistic and consider a downturn in the market.
- As Stafford Borough is adjacent to the Greater Birmingham and Black Country Housing Market Area (GBBCHMA), has limited Green Belt constraints and has direct transport links to Wolverhampton and Birmingham, the council should liaise with the Housing Market Area (HMA) authorities and potentially assist in accommodating some of the GBBCHMA's housing shortfall.

## Stafford Borough Council Response

Stafford Borough Council notes the comments made and a proposed housing requirement for the borough will be published in the Preferred Option.

### 5.Bb) Should a Partial Catch Up rate allowance be incorporated?

A total of 49 responses were made to this question.

Response	Count
PCU <b>should</b> be implemented	39
PCU <b>should not</b> be implemented	10
No View Expressed	132
<b>Total</b>	<b>181</b>

**Responses were received from the following respondents:** 8, 17, 19, 22, 24, 26, 29, 33, 53, 55, 56, 57, 58, 62, 64, 66, 67, 68, 69, 70, 71, 74, 75, 76, 79, 81, 85, 86, 87, 88, 89, 91, 93, 94, 97, 98, 99, 100, 101, 102, 103, 106, 110, 111, 162, 165, 172, 175, 181

## Summary of Responses

- Those advocating for the incorporation of a Partial Catch Up (PCU) rate allowance typically agreed with the rationale set out in paragraph 5.8 which sets out that as Sub National Household Projections (SNHP) draw on past trends, this results in household formation rates continuing to be suppressed, having been suppressed during the recession.
- Some responses suggested that this potential undercounting is particularly pertinent considering that headship rates amongst 15-34 year olds are projected to make up 50% of the difference of long term trends.
- A number of responses stated that any anomalies within past trends are not projected forward in consideration of future housing requirements. This will ensure that household formation rates are rebalanced to take account of the

accelerated rates young people are able to form households since the recession.

- Some respondents advocated a partial PCU (e.g. 50%).
- One respondent suggested it is necessary to approach this with caution, to avoid any possibility of double counting.
- One respondent asked for greater clarity in relation to the PCU allowance as the EHDNA does not clearly denote the PCU rate which is applied to each housing requirement scenario.

### **Stafford Borough Council Response**

Stafford Borough Council notes the comments made and a proposed housing requirement for the borough, and whether or not a PCU is incorporated, will be published in the Preferred Option.

Any adjustments made to the borough's housing requirement will also, in respect of the PCU, take account of the NPPF and PPG.

### **5.C) In calculating the Housing Requirement figure for the New Local Plan 2020-2040 should a discount be applied to avoid a double counting of new dwellings between 2020 - 2031?**

A total of 53 respondents made representations in respect of this issue.

**Responses were received from the following respondents:** 3, 8, 17, 19, 22, 24, 26, 27, 29, 30, 33, 54, 55, 56, 57, 58, 61, 62, 64, 66, 67, 68, 69, 70, 71, 74, 75, 76, 79, 80, 81, 83, 85, 86, 87, 89, 91, 93, 94, 97, 98, 99, 101, 102, 103, 104, 106, 110, 111, 162, 168, 172, 181

### **Summary of Responses**

Of all responses there was roughly an equal split of those advocating one of the following options:

- a) A discount of 6,000 in the way implied by the Issues and Options document.
  - b) That only the allocations and other commitments that the council has confidence in their timely delivery should be carried forward.
  - c) No discount at all should be applied.
- a) Those advocating a 6,000 "dwelling discount":
- One response interpreted the term "discount" as "*...that the homes currently under construction or approved in principle will be counted as part of the homes to be built under the new plan.*" This captured the spirit of the term "discount" which is accepted to be technically loose, but which reflected the view of the council in the preparation of the Issues and Options document.

- A significant proportion of those advocating that a “6,000 dwelling discount” should be applied did so on a simple “yes” basis. There were however a number of justifications expressed for such an approach. These included:
  - The view that the level of development in the current Plan is already too high.
  - Provision of continuity between the current adopted local plan and new local plan.
  - Support for the need to avoid double counting.
  - 11-year overlap with the currently adopted Local Plan 2011-2031, which has already exceeded the housing target for 2011-2031.
  - Uncertainties in economic situation in light of the global recession, the effects of Brexit and future trade / customs treaties, and the fallout from Covid-19 pandemic.
- One response specifically highlighted the need for complete transparency in the approach to be taken in its calculation.

b) Those advocating that only the allocations and other commitments that the council has confidence in their timely delivery should be carried forward:

- The House Builders Federation expressed concern that the question appeared to confuse the housing requirement figure and Housing Land Supply (HLS) together. Further stated that:
  - In the new local plan, there should be a clear distinction between the housing requirement and HLS.
  - There should be no discounting of the housing requirement figure for newly built dwellings completed since the start of the plan period.
  - The council’s HLS should separately identify completions and adopted allocations.
- The NPPF states that councils may only take into account sites with outline planning permission or with greater certainty. This cannot include stalled sites, lapsed planning permissions, or allocations which have not yet come forward. It was noted by some responses that the council has argued forcibly at appeal that allocations within the current plan and permissions are deliverable and that, despite objections from others, this position was accepted by the relevant Inspector. It was further suggested that the council runs the risk of a lack of confidence in its own position to now argue that the housing strategy cannot be delivered should there be an implication of a shortfall.
- A number of responses suggested that the use of the term ‘discount’ in the Issues and Options document is potentially misleading, although respondents agreed that the council should seek to avoid double counting. To avoid this greater clarity was suggested:
  - The housing requirement to 2040 should be calculated using one of the approaches set out in the EHDNA and should be clearly stated.

- Those 6,000 units accounted for in the current plan, i.e. commitments to be rolled over into the next plan period, should be considered as part of the supply rather than artificially altering the requirement figure.
- In considering the commitments to be taken forward into the new plan period consideration will need to be given to existing commitments. It was suggested that the Plan should employ a more sophisticated mechanism to consider the 6,000 dwellings consented with permission and on Strategic Development Locations to assess whether these will be delivered at sufficient pace by 2031.
- If certainty of delivery is not assured in respect of certain developments, appropriate adjustments should be made to the number of dwellings rolled forward into the new plan period.
- Any site deemed to be available, suitable and achievable, and determined to be deliverable or developable should then inform a borough wide trajectory for the period 2020-2040.
- To achieve the necessary certainty of supply it was suggested to the council that the council should:
  - 1) Review all sources of housing supply, including existing commitments
  - 2) Prepare a site-specific housing trajectory to support the Preferred Options consultation. This should provide delivery assumptions in respect of any proposed preferred option allocation i.e. build out rates and lead in times. In doing so where sites currently relied upon for delivery prior to 2031 are no longer considered to represent a deliverable or developable proposition or there are more appropriate alternatives in line with a new spatial development strategy, those current assumptions should be removed from the supply and the emerging local plan as appropriate.
  - 3) Be able to demonstrate a rolling five-year supply of deliverable housing land throughout the plan period in accordance with the requirements of the NPPF.
- A number of responses, in their consideration of the number of this “discount” issue, specifically considered the stated slow rate of delivery on the current strategic sites suggesting this highlights a danger in an over-reliance on such sites in ensuring delivery of the housing requirement.
- Some responses referred to the need for the council to make an allowance in its housing requirement for the non-implementation of allocated or permitted housing developments, or simply slippage in the delivery of new homes. It was suggested that the council could do this by making an upward adjustment to its housing requirement. The government’s Local Plans Expert Group (LPEG) has recommended an adjustment of 25% to this end.
- A number of responses suggested that, with the strong evidence to be derived from the council’s monitoring, an allowance should be made for potential new ‘windfall’ sites.

c) Those advocating that no discount at all should be applied:

In many ways the arguments used by those advocating a “no discount” approach mirrored much of the discussion in the second category above with concerns expressed including:

- Housing Requirement figure for the local plan should be expressed as a total figure without discount as the local plan will replace the currently adopted Plan for Stafford Borough.
- A perceived risk of under-delivery against the housing need due to the suggestion that the council cannot have absolute confidence that all of these commitments can be delivered by 2031.
- The existing allocations that have not been developed should be reconsidered and assessed alongside the new sites which have been submitted to the council through the Call for Site’s process.
- It is logical that existing uncommitted allocations or other sites relied upon to deliver homes by 2031 may contribute to this housing requirement. However, any existing site that is to be relied upon should be subject to the same scrutiny and assessment as any other ‘reasonable option’ being promoted through the local plan process. Any site deemed to be available, suitable and achievable and determined to be deliverable or developable should then inform a borough wide trajectory for the period 2020-2040.
- It is the role of public examination to scrutinise all potential sources of supply, especially non-allocated windfall sites.
- A site-specific housing trajectory should be prepared to support the Preferred Options consultation. It was suggested that this should provide delivery assumptions in respect of any proposed preferred option allocation i.e. build out rates and lead in times.
- If sites currently relied upon for delivery prior to 2031 no longer represent a deliverable or developable proposition or there are more appropriate alternatives in line with a new spatial development strategy, they should be removed from the supply and the emerging local plan as appropriate.

#### Other comments

- A simple discount approach is not one that is set out in the National Planning Policy Framework (NPPF) or Planning Practice Guidance (PPG), as such its soundness would be open to question.
- The intention to roll forward 3,000 uncommitted dwellings on Strategic Development Locations, notwithstanding that these dwellings are allocated in the current Plan, there is a question mark over why they have yet to deliver. Clearly, there may be a timing issue due to the current Plan Period and that they may have yet to come forward, or there could be a more fundamental reason as to why they have yet to start delivering. If the latter, it would be

unwise for the council to simply roll forward the allocations without examining why the sites haven't delivered and why they consider that they will in the future. If there are question marks over their deliverability then, it was suggested, alternative sites should be allocated.

### **Stafford Borough Council Response**

The council accepts that the term "discount" might have been potentially misleading. The term was employed in a non-technical way, as demonstrated by the use of quotation marks at para 5.11 of the document and was intended to communicate to non-specialists that the Council wanted to take account of the overlap period of the two plans and the desire to avoid effective double counting as an unintended consequence of this overlap.

The Council accepts the need to:

1. Clearly and separately express a housing requirement which is based on the evidence base.
2. Rigorously test the deliverability of all existing allocations and commitments before being included in the stated housing land supply.
3. Provide a detailed housing trajectory to demonstrate the deliverability of the Preferred Option and Submission Plan.

In order to enable the council to do this, the council anticipates that developers and their agents will provide the necessary information in a timely and accurate manner in the format requested in respect of each development. The council will also consider the desirability of making a windfall allowance based on past windfall provision.

### **In addition to the above question**

A revised / corrected "Table 5.3: Growth experienced by Key Service Villages in the current local plan (April 2011 - March 2019)" was issued during the consultation period. This described the relative levels of development in the current Key Service Villages (KSVs) since 2011. This information was considered important by a number of responses, so although there was not a specific question in respect of Table 5.3 the following summarises those responses.

### **Summary of Responses**

- A small number of responses urged caution in using the data in Table 5.3 as a basis for considering where future growth in the Key Service Villages, or "Medium Village" of the Settlement Assessment should be allocated. The approach of villages which have not seen much growth in the 2011-2019 period being required to accept more growth in the local plan, was suggested as overlooking the amount of development that some villages have absorbed in the past. This was exemplified by a response in respect of Weston (Table

5.3 - between April 2011 to March 2019 planning permission for 14 dwellings was granted, amounting to a 3 % growth) implying that Weston has contributed a dis-proportionality small share of new housing, with possible implications for future development allocations. The respondent further observed that prior to 2011, Weston accommodated substantial new residential development (Salt Works Lane), which increased the number of dwellings in the village by almost 24%.

- Gnosall Parish Council welcomed the corrected data in the revised Table 5.3 and urged Stafford Borough Council to be aware that Gnosall has “*virtually doubled in size over recent years due to additional residential development*” and is now, with some 5,000 plus residents, officially classed as one of the largest villages in England.
- Also, in respect of Gnosall it was highlighted by another respondent that there has been a loss of shops and other supporting infrastructure.
- One respondent observed that development of key service villages has gone hand in hand with local employment opportunities with all those over 18% having an attached business park, or similar, whilst those below 18% do not.
- One response questioned why the number of dwellings was considered by Table 5.3 and not population, expressing concern that this approach will allow KSVs to turn into small towns.

### **Stafford Borough Council Response**

Stafford Borough Council welcomes consultees’ recognition of the importance of this data and would wish to reassure consultees that, whilst the data in Table 5.3 and Appendix 1 will inform the council’s approach, it will not form the sole basis for the distribution or scale of future allocations.

### **5.Di) Do you agree with the basis for the preparation of the 2019 Settlement Hierarchy?**

<b>Response</b>	<b>Count</b>
Agree / Yes	53
Disagree / No	16
Other Comments	2
No View Expressed	110
<b>Total</b>	<b>181</b>

**Responses were received from the following respondents:** 3, 8, 10, 14, 16, 17, 19, 20, 22, 24, 25, 26, 27, 33, 44, 53, 54, 55, 56, 57, 58, 61, 62, 65, 66, 67, 68, 69, 70, 71, 74, 75, 76, 77, 79, 80, 81, 85, 86, 87, 88, 89, 91, 92, 93, 94, 95, 97, 98, 99, 100, 101, 102, 103, 106, 110, 111, 112, 113, 116, 119, 126, 127, 132, 160, 162, 163, 166, 167, 172, 174



## Summary of Responses

### General Comments

- There was broad agreement with the basis for the preparation of the 2019 Settlement Hierarchy and the point made in paragraph 5.20 of the consultation document, which states that it is important for the local plan to direct the growth in housing supply to the locations best suited and most attractive to the market, whilst ensuring that no locations are overburdened or starved of growth and ensuring sustainable patterns of growth.
- It was suggested that a settlement hierarchy is a helpful way of illustrating, in simple terms, the relative sustainability credentials of a borough's settlements and by distinguishing settlements in sustainability terms, the hierarchy can be used to inform decisions taken about where growth should and should not occur. However, it was suggested to the council that just because a settlement appears in the hierarchy this does not automatically mean that it is a suitable location for development. It was further suggested that it is perfectly appropriate to identify a small settlement in the hierarchy, allocate it to a low tier, and then adopt a spatial strategy that presumes against development within or adjacent to it.
- Further benefits of a settlement hierarchy were suggested as being that the plan can be interpreted easily and that it provides for an effective means to monitor the plan's implementation.
- A number of respondents suggested that the approach taken to reviewing the current adopted Settlement Hierarchy has the potential to better address housing and employment land requirements across the borough, to enable natural growth to provide for the improved sustainability of those settlements rather than this being limited primarily to the main urban areas of Stafford and Stone.
- This was qualified by one respondent who, whilst agreeing with the approach taken by the council, highlighted the following:
  - This evidence needs to sit alongside an assessment of local housing needs at the Large Settlements and the findings of the Strategic Housing and Employment Land Availability Assessment (SHELAA) to help inform what levels of development should be directed to Large Settlements as part of a sustainable spatial; and
  - There is no justification for the split between Tier 3 and Tier 4 settlements, e.g. no evidence is included to compare the number of services and facilities in the Northern Urban Areas (Tier 3) with those of the Large Settlements (Tier 4) in section 7.1 of the assessment. These tiers can easily be consolidated as a single 'Tier 3'.
- A number of responses specifically welcomed the inclusion of Eccleshall, Gnosall, Great Haywood, Little Haywood, Hixon and Colwich as "Large Settlements" with the view expressed that the larger settlements within the

borough should be considered more sustainable by virtue of the level of service provision and facilities present, and that as a result they should generally be the focus for development. A small number argued for the greater differentiation of Eccleshall and Gnosall to differentiate them from other “Large Settlements”.

- A number of respondents considered that the inclusion of smaller settlements enabled differentiation of where the appropriate levels of development can be directed. Conversely some expressed concern that inclusion of smaller settlements in the Settlement Hierarchy is likely to result in a more dispersed form of development, that, by its very nature will be less sustainable. It was however acknowledged that some of the smaller settlements need some new development to help sustain them going forward.
- A number of representations were opposed to the proposed settlement hierarchy and housing allocations in smaller settlements. These were mainly from individuals and parish councils who saw such matters for local people and elected parish councils to consider via neighbourhood plans. It was stated by one response that Gnosall and other villages in the Borough Council’s area have adopted neighbourhood plans in recent years, in an attempt to prevent future inappropriate large-scale housing development. Consequently, these Plans could now be threatened by changes to the Settlement Boundaries on which these Plans are based.
- Another objection was made with the view expressed that the overall hierarchy should not have, as a basis, the ‘suitability and attractiveness to the market’ but instead be formulated around a principle of need.
- A small number of responses expressed concern that Appendix 1 (Sub area share of development based on 2011 Census) would be used as the basis to assign distribution of development in the new local plan and argued that settlements should be considered on their own sustainability merits and, accordingly, the majority of housing growth for the borough should be directed to and dispersed across Stafford, Stone and the Large Settlements.
- Development should be focused at the most sustainable, logical and eligible locations irrespective of their settlement. It is entirely true that many ‘edge of settlement’ sites in Stafford will be less sustainable than those on the edge of a Key Service Village. The council should consider likely improvements to the sustainability of all settlements, such as the impacts of HS2, the potential reopening of the Stafford to Shrewsbury railway line and potential new facilities which are planned.
- Concern was expressed by a number of responses that preventing any development in the smallest rural village settlements is not sustainable, as it is failing to bring young energetic people into the smallest villages, who play a vital role in community activities e.g. organising events and mowing lawns for church or elderly neighbours. These villages are aging, which is not sustainable.

- Concern was also expressed in relation to the loss of employment land, and therefore jobs, to residential development within settlement boundaries.
- There was a suggestion that smaller villages have lacked development attention and so, as a consequence, every village and hamlet below the Key Service Villages should now have some form of mixed residential development within the new plan being suggested as an opportunity for planners to provide the affordable and self-build homes within these villages by liaison with willing landowners to provide the available land to develop.

### **Settlement-specific comments**

Stafford:

- There is strong support for Stafford Town continuing to be identified as the Tier 1 settlement in the borough. This reflects Stafford's position as the largest settlement within the borough and its regional significance as a service centre providing employment, retail and other facilities.

Stone:

- There was strong support for the emerging Settlement Hierarchy which identifies Stone as a Tier 2 settlement, second only to Stafford. This reflects Stone's position as the second largest settlement within the borough and the sustainability credentials of the town.
- A number of comments were made specifically in respect of the settlement boundary for Stone, with some suggesting that it needs extending to provide new sites after 2031 but pre-2031 small sites on the edge of the settlement can provide useful addition.
- In respect of the future sustainability of the town it was commented by one respondent that Stone is getting near the limit of size for minimizing car use.

### **Level 4 settlements (Colwich, Eccleshall, Gnosall, Great Haywood, Hixon, Little Haywood)**

- There was general support for the proposed list of settlements attributed to Level 4. Some reservations were expressed in respect of the inclusion of Little Haywood and Colwich, and the exclusion of Weston in the large settlement category.
- The role of Level 4 settlements in providing services and facilities to the surrounding rural area was recognised along with their own role in supporting the social and economic need of Stafford Borough. It was further suggested that it is important that settlements such as these are able to be flexible and adaptable, and therefore allowing additional housing to meet the needs of the local community who wish to remain in the settlement and those who would like to reside in a settlement smaller than Stafford or Stone.

- It was also suggested that the Level 4 settlements in reasonably close proximity to Stafford and Stone had an important role in reducing the pressure on Stafford, Stone and the other largest villages in the borough (and any other Garden Community(s) / Major Urban Extension(s) that feature in the new local plan) to achieve the borough's development requirements over the coming years.
- To achieve this, it was suggested that these settlements should be allowed the opportunity to grow and adapted in order to remain sustainable but with consideration given to the important history of the settlements.

#### Eccleshall:

- A number of responses highlighted that Eccleshall is one of the largest settlements in the borough outside of Stafford and Stone and accordingly has a good range of services and facilities indicating a high level of sustainability.
- One response suggested that the Settlement Assessment should be updated to reflect the hourly bus service (route 14) to Stone and Stafford which is currently missing, as should the significance of Eccleshall containing one of the borough's key local retail centres.
- It was suggested that the council takes into account market signals, as Eccleshall is located in a part of the borough which has higher than average house prices and rental costs than the urban areas with the respondent concluding the market signals point to a stronger comparative demand in the area requiring additional housing provision in order to address affordability issues in the area.
- A number of responses commented on the growth in Eccleshall (table 5.3) and compared this to Appendix 1 and concluded that the recent growth of Eccleshall had been disproportionately great, putting Eccleshall under considerable strain in relation to services and facilities and volume of traffic. It was suggested that some rebalancing between settlements was required.
- Conversely one developer considered that the scale of growth which has taken place in Eccleshall is not 'disproportionate' and suggested that it is a sustainable settlement with significant capacity to accommodate additional housing growth in the local plan.
- Additionally, the Eccleshall Parish response promoted Slindon for development as a small settlement, not Croxton. Slindon is close to Raleigh Hall Employment Zone, has a church, a fishery and a bus route.

#### Gnosall:

- The inclusion of Gnosall in the Larger Settlements category was widely supported since it recognised the village's status as one of the largest settlements within the borough and the sustainability credentials of the village.

- Some responses suggested that the rate of development in Gnosall had been low in comparison to other settlements and as such additional development should be directed to the village.
- However, others expressed concern on the impact of significant development in Gnosall and Haughton on the local services, A518 and surrounding roads / rural lanes.

#### Hixon:

- The inclusion of Hixon in the Large Settlements category was generally welcomed.
- There was considerable opposition expressed by local residents in respect of the potential scale of development should a Garden Community proposal for the airfield and other sites proceed, although the proposer of the scheme suggested that it would make an important contribution towards delivering the borough's development requirements during the plan period of the local plan and in turn further enhance the range of services and sustainability of this important settlement in relatively close proximity to Stafford.
- Hixon Parish Council agreed with the proposed approach to distribute new developments more evenly throughout the borough but suggested that more development should be directed to the north of the borough to help accommodate Stoke's growth requirements.

#### Little Haywood and Colwich:

- One response suggested that Little Haywood and Colwich, in light of their fewer facilities and services (e.g. no post office, shop or schools), were not comparable to the other settlements denoted as Large Settlements and were less able to support additional development. As such this should be re-evaluated.
- Conversely one response highlighted the low amount of recent development in Little Haywood (Table 5.3) and suggested that more should be directed towards that settlement, in order to maximise the benefit of existing facilities / infrastructure.

### **Stafford Borough Council Response**

Stafford Borough Council welcomes the broad support for the approach taken in the preparation of the Settlement Hierarchy. Stafford Borough Council also notes the specific points made in respect of the preparation of the settlement hierarchy, particularly in respect of specific settlements, and will consider these in the preparation of an updated Settlement Hierarchy to be presented as part of the Preferred Option.

## 5.Dii) Do you agree that the smaller settlements should be included in the Settlement Hierarchy?

Response	Count
Agree / Yes	36
Disagree / No	4
No View Expressed	141
<b>Total</b>	<b>181</b>

**Responses were received from the following respondents:** 8, 11, 20, 24, 26, 27, 33, 44, 54, 56, 57, 63, 67, 68, 69, 70, 71, 74, 75, 76, 77, 79, 80, 81, 86, 87, 88, 89, 92, 97, 98, 101, 102, 106, 112, 127, 130, 163, 167, 174

### Summary of Responses

There was broad agreement that the smaller settlements should be included in the settlement hierarchy but there was some discussion about how this might be best achieved, and many respondents do not consider the smaller settlements to be a suitable location for sustainable development.

It was suggested by one or more responses that:

- Whilst some small-scale development for local needs in these smaller settlements will assist their longer-term sustainability many of them are inherently less sustainable in overall terms for development on any significant scale.
- Any development in these smaller settlements should not be allocated but should be treated as windfalls so that the primacy of the larger settlements is re-enforced and not eroded.
- Policy should make it clear which tiers of the hierarchy are considered sustainable locations that have the capacity to accommodate significant housing growth and which are not, and the scale of housing growth to be accommodated having regard to the relative sustainability of the settlements in different tiers of the hierarchy.
- Inclusion within the settlement hierarchy should not, in itself, result in such settlement being afforded growth requirements through a spatial development strategy. Development growth should be focused to the most sustainable settlements within the borough.
- All settlements need to be looked at with regard to their potential. It would be dangerous to overlook all smaller settlements and to therein bring about slow attrition in these areas with declining services and ageing populations.
- Whilst the expansion of the settlement hierarchy is welcomed it doesn't make any allowance for a suitable level of incremental development in settlements below the level of 'small'. In assigning every settlement below 'small' as "open countryside", there is a real danger that smaller settlements will be sterilised, and the viability of rural shops and services will be threatened as a result.

Such a policy could lead to a vicious circle of unsustainability; in ruling out settlements below 'small' as fundamentally unsustainable, it would effectively artificially freeze those settlements and prevent the type of natural small-scale and incremental growth commonly seen in such small rural settlements through history.

- The result of ruling out a swathe of settlements as unsustainable will seriously threaten rural services. This is recognised in the NPPF, which clearly advocates a pragmatic and flexible approach to policy-making in this regard.
- It is therefore suggested that a further category of 'Rest of borough' is included, which would cover all settlements at the bottom of the hierarchy. The associated policy should make allowance for small-scale incremental development where there would be no unacceptable harm to amenity and where the development would be judged to be sustainable.
- A beneficial approach to addressing rural housing need, may be to consider settlements as clusters where they are known to function collectively and growth in one may benefit another, which at present may be considered unsustainable.
- If smaller settlements are included, there should be a plan to correct some of the lack of facilities e.g. lack of public transport. This could also be justified as a 'green' issue by reducing the carbon footprint.
- A number of responses also referred to the relationship between the local plan and the neighbourhood plans, with several suggesting that the neighbourhood plan should have primacy over the local plan in respect of site allocations.

### **Settlement specific comments**

Salt:

The parish council suggested Salt should not be considered within the smaller settlement category unless development can address the following issues:

- Issues with infrastructure including narrow road layouts.
- Lack of public transport leaving people without their own transport unable to access services and facilities outside of Salt.
- Lack of connection to mains gas.
- Issues with sewers and drains which have been causing flooding and issues with gullies.
- The area is a floodplain and any development needs to reflect the issues with flooding above. This is actual flooding seen, as opposed to flooding on flood assessments which now may not be in line with actual flooding.
- The parish council further consider that as a small settlement any development would not be of a scale to resolve any of these issues. As Salt is close to two of the proposed Garden Village locations, if these went ahead

then they are unsure how small-scale development in Salt would be of benefit to the local plan overall.

Stowe-by-Chartley:

- One response suggested that Stowe-by-Chartley, as a rural hamlet outside of the Settlement Hierarchy, development of any scale is inappropriate in that community.

Weston:

- One developer was concerned that the new settlement hierarchy reduces the role of Weston to a 'medium' rather than a 'key' settlement noting that Weston is a sustainable village with good connections to other services by public transport.
- The July 2018 Settlement Assessment for Weston states that the village has one Post Office and general store, this was incorrect in 2018 and remains incorrect in 2020. The Post Office service was withdrawn in 2010 and the remaining general stores element of the business closed in 2013. Subsequent attempts to establish a Community Shop were unsuccessful. There is no Post Office or shop in Weston. The nearest facilities are in Hixon (Post office and convenience store) or at Beaconside (new convenience store). Concern was expressed that decisions about the Settlement hierarchy and possible location of new development are to be made on the basis of information that was inaccurate when the Settlement Assessment was originally compiled and remains inaccurate today.

Yarnfield:

- It was questioned why Yarnfield has been removed as a settlement listed on the hierarchy within the consultation document when compared to the currently adopted local plan. Yarnfield should be listed, as it can be seen as a more sustainable location than many of the other settlements listed in tier 4-6 of the hierarchy as proposed.

### **Stafford Borough Council Response**

Stafford Borough Council welcomes the broad support for the approach taken in the preparation of the Settlement Hierarchy. The council also notes the specific points made in respect of the preparation of the settlement hierarchy, particularly in respect of specific settlements, and will consider these in the preparation of an updated Settlement Hierarchy to be presented as part of the Preferred Option.



**5.E) The northern built-up areas of the borough are not properly recognised in the currently adopted Plan. Should these areas be identified in the new Settlement Hierarchy?**

<b>Response</b>	<b>Count</b>
Agree / Yes	26
Disagree / No	6
No View Expressed	149
<b>Total</b>	<b>181</b>

**Responses were received from the following respondents:** 3, 14, 17, 19, 22, 24, 26, 27, 33, 40, 47, 54, 57, 58, 61, 74, 75, 76, 85, 89, 92, 99, 100, 101, 102, 103, 106, 116, 162, 166, 172, 174

### **Summary of Responses**

There was a mixed response to this question with the majority of respondents being in support.

- One response suggested that describing Tier 3 settlements as “North Staffordshire Urban Areas” is potentially misleading as there are other, similar, suburban areas in adjacent councils’ areas, which would meet the description but are not in Stafford Borough or its jurisdiction.
- Key concerns of those responding related to three factors:
  - The Green Belt status of the area.
  - Stafford Borough Council’s stated view at this stage that there are “*no exceptional circumstances*” that would justify a review of the North Staffordshire Green Belt.
  - Inclusion in the settlement hierarchy should not determine whether these areas should form part of the spatial development strategy for delivering growth. Development within this area should have regard to any cross-boundary requirements related to Stoke-on-Trent and Newcastle-under-Lyme in particular.
- In answering the question many welcomed the principle of the inclusion of these settlements as Tier 3 in the settlement hierarchy but, ultimately, questioned the relevance of their inclusion due to the impact of the Green Belt on the ability for development or significant growth to take place in those settlements.
- The defence of the Green Belt was generally welcomed but some respondents encouraged the council to not entirely dismiss the potential for relatively small adjustments to the boundaries and extent of the Green Belt where this offers the potential to achieve preferable development solutions to meet the borough’s development needs to 2040 and ultimately more deliverable and sustainable, well-planned development, whilst at the same time not prejudice the purposes of including land in the Green Belt due to the siting, nature and other relevant characteristics of the potential land release

involved. Such arguments were applied in particular to areas to the north of Stone or to settlements that are suitably located to accept some development from Stoke-on-Trent or Newcastle-under-Lyme.

- Other responses specifically requested that the council undertook a review of the Green Belt.
- The Trentham Estate response made a number of key points:
  - Supported the Settlement Assessment (July 2018) suggestion that ‘Trentham Gardens’ is included within the North Staffordshire Urban Area. This is based upon the sustainability of the Estate and its proximity to a number of services and facilities, with existing housing. Requested that the wording within the draft Plan is clear that this includes Trentham, rather than relying on the wording within the evidence base.
  - Disagree with the comment in Table 5.5 on Redevelopment / Development implications, where it states that *‘To remove “washed over” status or the introduction of a settlement boundary would require a review of the Green Belt’*. Proposed a site-specific policy for the Estate, and as part of this a settlement boundary and / or allocation boundary to clearly identify the relevant land would not remove its Green Belt status or the protections afforded by it. This could be reflected in the wording of the specific policy for the Estate.
  - Arising from the potential need to accommodate growth (housing or employment) it was argued that the Estate is well related to Stoke and Newcastle, and some housing on the previously developed parts of the site could assist. The Estate has previously discussed the opportunity for housing on the site with the council.
- A suggestion that these settlements should only be included in the settlement hierarchy on the basis of “need” and “public transport connections”. The respondent stated that this would involve liaising and working more strategically with Stoke-on-Trent City Council on economic development and public transport infrastructure. These areas should only be included in the hierarchy on the basis that such work collaboration is actively taking place.
- Concern was expressed in relation to the principle of development in the part of the borough currently designates as North Staffordshire Green Belt due to the risk of urban sprawl in the medium term.
- A small number of responses advocated that housing could be allocated to Barlaston, Meir Heath and Forsbrook which have viable local communities.

### **Stafford Borough Council Response**

Stafford Borough Council notes the specific points made in respect of the preparation of the settlement hierarchy, particularly in respect of the northern built-up areas of the borough and will consider these in the preparation of a refreshed Settlement Hierarchy to be presented as part of the Preferred Option.

At the time of the preparation of this summary it was the council's view that no exceptional circumstances had been demonstrated to warrant a review of the North Staffordshire Green Belt. The council will retain the right to revisit this position should appropriate evidence be shared with the council and based on the development strategy approach. Notwithstanding this position it is also the council's view that appropriate development within the policy framework should be able to be permitted in the northern built-up areas of the borough.

**5.Fa) In respect of these potential spatial scenarios do you consider that all reasonable options have been proposed? If not, what alternatives would you suggest?**

<b>Response</b>	<b>Count</b>
Agree / Yes	39
Disagree / No	5
Other Comments	5
No View Expressed	132
<b>Total</b>	<b>181</b>

**Responses were received from the following respondents:** 3, 8, 10, 12, 19, 22, 24, 26, 29, 30, 33, 39, 54, 55, 57, 58, 61, 66, 67, 68, 69, 70, 71, 74, 75, 76, 77, 78, 79, 80, 81, 86, 87, 91, 92, 93, 94, 100, 101, 102, 103, 107, 112, 116, 119, 128, 139, 160, 162

**Summary of Responses**

There was a broad consensus that all of the reasonable options for the spatial scenarios had been considered.

- A small number of respondents took the opportunity to remind the council of the need for whichever option (or combination of options) that is ultimately selected to:
  - Deliver sustainable growth and, that for this to happen, the growth must be directed towards sustainable locations and allow for sustainable travel patterns.
  - Provide sufficient land to enable the delivery of the borough's housing requirements and ensure a 5-year land supply.
  - Maximise the benefit of any remaining brownfield land whilst at the same time recognising the limits of this resource.
  - Allow for sufficient green space and biodiversity.
- One response, whilst agreeing with the options, disagreed with the execution of the options by the council insisting that the approach should have been Green Belt blind to enable the examination of a greater range of development in the northern part of the borough, either in its own capacity or as an extension to Stoke-on-Trent.

- Within the context of the spatial scenarios, it was also suggested that the redefinition of the Level 4 “Large” settlements provides an opportunity to prioritise / re-categorise the most sustainable settlements which were viewed as having the potential for a sustainable urban extension and an increased role in enabling growth leading to those settlements’ improved sustainability.
- A small number of responses highlighted the potential impact of HS2 on the borough and the need for the selected pattern and distribution of development to maximise the benefit of this infrastructure investment.
- Some criticism was addressed towards the council by some responses suggesting more information, especially including the sustainability appraisal, should have been provided to help respondents form a view in respect of the implication of the various growth options on certain settlements or categories of settlements. It was further suggested that a further Regulation 18 round was required before the selection of the council’s preferred strategy so that the sustainability appraisal is sufficiently robust.

### Stafford Borough Council Response

Stafford Borough Council welcomes the broad consensus that all of the reasonable options for the spatial scenarios had been considered. The council also notes the specific comments made and these have been considered in the preparation of the Preferred Option.

### 5.Fb) Are there any of these spatial scenarios that you feel we should avoid? If so, why?

A total of 25 respondents made representations in respect of this issue.

Spatial scenario	Responses against
Intensification of town and district centres	11
Garden Communities	11
Dispersal of Development	9
Intensification around edges of larger settlements and strategic extensions	3
String settlement - settlement cluster	10
Wheel settlement cluster	9

Please note, a number of responses were provided against multiple spatial scenarios, so the total number of responses in the table exceeds the number of individual responses.

**Responses were received from the following respondents:** 8, 12, 24, 26, 29, 54, 67, 68, 69, 70, 71, 76, 77, 79, 80, 81, 91, 92, 94, 97, 98, 112, 127, 128, 162

## Summary of Responses

As can be seen from the data above only a relatively small number of respondents expressed a view as to which spatial scenario or combination should be avoided. Amongst these there was typically more than one scenario suggested to be avoided.

There was not a single spatial scenario that was not criticised, however it can be seen that “Intensification around edges of larger settlements and strategic extensions” (which is an important element of the currently adopted local plan) received least opposition. The other spatial scenarios all received similar levels of opposition. Comments received in respect of each approach are summarised below.

Intensification of town and district centres:

- The level of development the Town and District Centres have experienced over the current plans period was argued to have led to an over-intensification of development within these areas. This could lead to increased pressure on services, such as public transport, and may result in stagnated rural communities and villages.
- A concern that new development would just be focused on the Town Centre and not the entire settlement.
- Would not enable sufficient new housing sites to be identified and allocated, so would not result in the borough’s housing needs being met.
- There is need for a careful balance between increasing residential uses and hampering the attractiveness of leisure uses to be located in town and district centres, due to amenity issues related to noise and odour.
- It was questioned whether locating dwellings in town and district centres would be able to provide family housing.

Garden Communities:

- Only a small number specifically opposed the Garden Community approach.
- Due to the lag-times associated with large schemes such as a Garden Community, realism would be required in respect of the potential contribution it could make within the new plan period.
- Most responses cautioned the authority in that a Garden Community would need to be:
  - Fully justified in the proposed location.
  - Of a sufficient scale to support the provision of new infrastructure i.e. social, physical and environmental.
  - Able to viably deliver a range of new homes and employment in an appropriate timeframe commensurate with the requirements of the plan, i.e. to meet housing and employment land requirements early on and at a rate that does not lead to a shortfall in supply and / or in housing terms, a worsening of affordability.

- A concern that the sustainability of existing settlements would be undermined
- Generally, the substantial loss of prime farming land (with the exception of Meecebrook) which the respondent understands to be mainly comprised of brownfield land.
- Unless there are high quality transport corridors currently available with abundant spare capacity the resulting impact on existing communities will be discordant and very disruptive.
- Impact on environment during construction and post completion. Not possible to effect sufficient man-made environmental gains to offset negative impacts (Telford was cited as an example).
- Length of time required for delivery and levels of capital investment that would be required. Necessity for front loading / pump priming. This would require all roads, schools, health facilities etc. to be in place at an early stage along with utilities.

#### Dispersal of Development:

- Not truly sustainable.
- Unlikely to address housing needs (especially family and affordable housing) in the most sustainable locations.
- The planning and delivery of required infrastructure would be more complicated and potentially unviable.
- Inability of infrastructure to keep pace with demand.
- Impact upon rural areas that sit between the developed sites.

#### Intensification around edges of larger settlements and strategic extensions:

- The Gateway Project was viewed by one respondent as a major urban extension and as being more than enough development on the edge of the town.
- Mono-cultural / unbalanced development, the lack of anything but housing in existing town extensions.

#### Wheel and String cluster models:

- Criticism of these often went hand in hand. Therefore, to save duplication, these have been summarised together.
- Not truly sustainable.
- Unlikely to be practicable because of the reliance on the need to significantly improve and sustain public transport corridors in the long term.
- Although they appear to be individual and separate settlements, usually their infrastructure is a single system which serves the largest of the settlements with the smaller ones connected into it. These connections from the smaller settlements can often be inundated from new development and require upsizing which can be both costly and disruptive.

- Likelihood of development being directed towards less sustainable locations and smaller settlements.
- Unlikely to address housing needs (especially family and affordable housing) in the most sustainable locations.
- Inability of infrastructure to keep pace with demand.
- Impact upon rural areas that sit between the developed sites.
- Potential for ribbon development that would damage the character of existing settlements.

### Stafford Borough Council Response

Stafford Borough Council notes that all of the options were criticised to varying degrees, and the nature and scale of those criticisms. The council notes the specific comments made and these have been considered in the preparation of the Preferred Option.

### 5.Fc) Which of these spatial scenarios (or a combination) do you consider is the best option? Please explain your answer

A total of 45 respondents made representations in respect of this issue.

Spatial scenario	Responses in support
Intensification of town and district centres	21
Garden Communities	17
Dispersal of Development	19
Intensification around edges of larger settlements and strategic extensions	28
String settlement - settlement cluster	9
Wheel settlement cluster	10

Please note, a number of responses were in support of multiple spatial scenarios, so the total number of responses in the table exceeds the number of individual respondents.

**Responses were received from the following respondents:** 3, 8, 12, 19, 26, 47, 53, 54, 62, 64, 67, 68, 69, 70, 71, 74, 76, 77, 79, 80, 81, 88, 89, 91, 92, 93, 94, 97, 98, 99, 100, 101, 103, 106, 107, 110, 112, 113, 115, 127, 128, 139, 162, 173, 175

### Summary of Responses

Rather more respondents expressed a view as to their preferred spatial scenario than those that should be avoided (see above, 5Fb) although the pattern of the two sets of data is largely consistent with “Intensification around edges of larger settlements and strategic extensions” (which is an important element of the currently adopted local plan) receiving the greatest level of support. The least well-regarded spatial scenarios were the “wheel” and “string” cluster approaches.

A frequently made point was that the optimal approach would be achieved via a combination of the options. Accordingly, a number of respondents gave qualified support specifically to both “Intensification of Town and District Centres” and “Garden Communities” when combined with other options as potentially important strands to the strategy to be adopted in the new plan. Due to the qualified nature of such support this is not reflected in the data above. The following paragraphs capture the key points made by respondents in support for each of the spatial scenarios.

#### Intensification of town and district centres:

- Viewed as most sustainable.
- Maximises the use of brownfield land.
- Maximises use of existing infrastructure.
- Provides good access to public transport and other services.
- Reinforces the roles and prominence of the current main settlements.
- Would maximise the opportunity to support the changing role of town centres, due to increased online shopping, and to maximise the benefit of vacant retail units and under-used office buildings due to changing working patterns.
- Has potential for the roles of centres to conflict (e.g. residential and leisure).
- Town centre dwellings may not be suitable for all household types.
- Opportunity for the introduction of green and blue infrastructure.

#### Garden Communities:

- Potentially maximises the use of brownfield land depending on site chosen.
- Can be effectively used with other options to enable required level of growth and maintenance of 5-year land supply depending on the recognition of appropriate lag times and delivery rates.
- Should be of a scale sufficient to provide the necessary properly planned physical and social infrastructure.
- Opportunity for the introduction of properly planned green and blue infrastructure.
- Allows a designed settlement with master-planning and the arrangement of infrastructure in an idealised way.
- Unique opportunity to drive forward the realisation of Stafford’s economic growth ambitions as well as increasing the borough’s population, working age households and reducing the current levels of out commuting.



#### Dispersal of Development:

- Aligns with the current plan which has demonstrated a demand in the tier 4 settlements.
- Maximises benefit of current infrastructure.
- Allows for a greater number of settlements to take development when compared to the current plan making better use of social and physical infrastructure.
- Enables development to be distributed according to the individual and relative sustainability of settlements with a clear emphasis on the most sustainable and accessible settlements.
- Allows for more medium and small settlements to receive planned growth and avoid decay.
- Provides support for current physical and social infrastructure in rural areas.
- With appropriate levels of development will help to maintain the character of existing settlements.

#### Intensification around edges of larger settlements and strategic extensions:

- Viewed as most sustainable.
- Aligns with the current plan which has demonstrated a demand in these locations.
- Maximises benefit of current infrastructure.
- Potentially maximises the use of brownfield land.
- Reinforces the roles and prominence of the current main settlements.
- The expansion of Stafford town is now constrained in certain directions.

#### Wheel and String cluster models:

- The perceived benefits of these often went hand in hand, therefore, to save duplication, these have been summarised together.
- Maximises use of existing infrastructure.
- Would encourage the provision of public transport and other relationships between communities, including school and leisure facilities.
- Will enable development in smaller locations as well as the main hubs.
- Wheel cluster viewed to be most appropriate around Stafford town.

#### **Stafford Borough Council Response**

Stafford Borough Council notes the support expressed for the various spatial scenarios and notes the specific comments made. These have been considered in the preparation of the Preferred Option.

**5.G) Do you consider that the utilisation of a new Garden Community would be helpful in determining the approach to satisfying Stafford borough's future housing and employment land requirements?**

A total of 121 respondents made representations in respect of this issue.

<b>Response</b>	<b>Count</b>
Agrees with utilisation of a Garden Community in principle	37
Disagrees with utilisation of a Garden Community in principle	20
Neutral / Other Comments	64
No View Expressed	60
<b>Total</b>	<b>181</b>

**Responses were received from the following respondents:** 1, 3, 8, 10, 11, 12, 14, 17, 18, 19, 22, 24, 26, 27, 28, 29, 30, 31, 32, 33, 34, 36, 39, 40, 42, 54, 55, 57, 58, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 74, 75, 76, 78, 79, 80, 81, 82, 83, 85, 86, 87, 88, 89, 91, 92, 94, 95, 97, 98, 99, 100, 101, 102, 103, 106, 110, 111, 112, 117, 119, 120, 123, 124, 125, 126, 127, 128, 130, 132, 133, 134, 135, 137, 138, 140, 141, 142, 143, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 172, 173, 176, 178, 179, 180, 181

**Summary of Responses**

In respect of the views expressed about the general concept of whether or not a Garden Community might be employed to assist Stafford Borough meet its future need for growth, a number of key points were made by respondents:

- The need for adequate social (e.g. health, education), physical (e.g. roads, utilities) and community (e.g. shopping centre, district shops, pubs and restaurants, sports and play facilities) infrastructure to be brought forward at an early stage of the development.
- Concern about the potential impact on existing settlements, especially local roads, both during the construction of the Garden Community and after its completion.
- That if Meecebrook is pursued then active consideration should be given to a new railway station and direct access to the M6.
- The need to ensure that public transport is a viable option for residents so that car use is minimised.
- That construction standards and design should be of a high quality.
- That the settlement maximises the potential of large-scale and small-scale renewable energy sources both in respect of homes and transport.
- That water reuse is utilised.
- That opportunities for walking and cycling are maximised.

- That the council should be realistic in terms of delivery rates and that sufficient smaller sites are identified in order to ensure the 5-year housing land supply.
- That the Garden Community should be balanced through the incorporation of appropriate levels of employment, otherwise it will run the risk of being a massive housing estate.
- That a good mix of housing types and tenures are achieved to meet the needs of different groups in the community.
- That any development should incorporate sufficient green and blue infrastructure.
- That any development, especially Meecebrook, should take account of the prior uses of the site with any necessary decontamination etc. being conducted.

**If you do think the Garden Community / Major Urban Extension approach is appropriate which of the identified options is most appropriate?**

<b>Potential location for a Garden Community</b>	<b>Number of those in support</b>	<b>Number of those against</b>
Land north and east of Gnosall	1	8
Land between Gnosall and Haughton	2	10
Seighford	1	3
Land to the north of Redhill Business Park	3	1
Meecebrook	22	6
Hixon	7	37
vii. Land East of Weston	2	10

Please note, a number of responses were either in support or objected to multiple of the proposed options, so the total number of responses in the table exceeds the number of individual responses. This data is based on qualitative assessment of all responses and is not derived from simple yes/no questions.

### **Summary of Responses**

As might have been expected, the potential for a Garden Community to be included in the local plan was a commonly responded to aspect of the consultation. From the data above it can be seen that:

- There is a high level of support for the concept of the inclusion of a new Garden Community in the local plan with approximately 31% of respondents explicitly supporting the concept in principle, which is nearly twice as many as those explicitly rejecting the concept (16%).

- The remaining 53% of respondents who responded to the question provided neutral or other comments to the question, which were not deemed as explicitly supporting or opposing the utilisation of a Garden Community.
- The most supported location for a Garden Community was at Meecebrook which was by far the most widely supported proposal with more statements of support (22 total) than all of the other proposals combined (16 total).
- The second most supported proposal for a Garden Community was the proposal based at Hixon airfield with 7 statements of support, however this option was the one which received the most opposition (37 total). This reflected an active and coordinated opposition by this areas' residents.
- There were also notable levels of opposition to the two Gnosall and Haughton schemes and the scheme at Weston (which in many cases was also linked into the opposition for the Hixon proposal).
- In addition, two further options for the location of a Garden Community were suggested by respondents:
  - Urban centre of Stafford, in particular the land close to the new Western Access Road and the train station
  - North-east of Stafford

Proponents and opponents to the proposed options made several arguments for and against the proposed options.

### **Stafford Borough Council Response**

Stafford Borough Council notes the strength of support and opposition from consultees for the various reasonable alternatives identified for the construction of a Garden Community. In particular Stafford Borough Council notes the strength of support for the scheme at Meecebrook and the strength of opposition for the propositions at Hixon / Weston.

Stafford Borough Council notes the specific comments made and these have been considered in the preparation of the Preferred Option. In the Preferred Option it will be indicated whether the council will pursue a Garden Community and if so, which is the council's preferred scheme.

### **5.Hi and 5.Hii) Do you agree that the only NPPF compliant growth options are no. 3, no. 5 and no. 6? If you do not agree what is your reason?**

These questions were based on the growth options below which were identified in the Issues and Options consultation document:

1. Stafford and Stone focussed development
2. Stafford, Stone and Key Service Village focussed development
3. Dispersal across the new settlement hierarchy
4. All new development at a new Garden Community

5. Dispersal across the new settlement hierarchy and at a new Garden Community
6. Allocate development to settlements linked by existing transport corridors

<b>Response</b>	<b>Count</b>
Agree / Yes	35
Disagree / No	21
Not all compliant	4
Other Comments	2
No View Expressed	119
<b>Total</b>	<b>181</b>

**Responses were received from the following respondents:** 3, 10, 17, 19, 22, 24, 26, 29, 30, 39, 42, 53, 54, 55, 56, 57, 58, 61, 62, 63, 64, 65, 67, 68, 69, 70, 71, 74, 75, 76, 77, 78, 79, 80, 81, 83, 86, 87, 88, 89, 92, 93, 94, 95, 98, 101, 102, 103, 106, 110, 111, 112, 113, 120, 127, 128, 148, 155, 162, 165, 172, 181

### **Summary of Responses**

There was broad qualified agreement that the identified options represented the available growth options, with any disagreement largely centred around:

- Whether a greater concentration of development around Stafford and Stone should be considered (Growth Option 1).
- Whether the current strategy involving Stafford, Stone and Key Service Villages (Growth Option 2) should be considered and rolled forward to the new Plan.
- The desirability, or otherwise, of the transport corridor-based approach (Growth Option 6) which a number of respondents considered would lead to the risk of ribbon development.

### **Stafford Borough Council Response**

Stafford Borough Council notes that the identified options represented the available growth options and the potential variations suggested by respondents. These have been considered in the preparation of the Preferred Option.

### **5.Hiii) Do you consider there to be any alternative NPPF-compliant Growth Options not considered by this document? If so, please explain your answer and define the growth option.**

There were a total of 10 responses to this question.

**Responses were received from the following respondents:** 24, 26, 54, 64, 76, 79, 97, 99, 165, 180

No substantively different Growth Options were proposed as alternatives.

## Stafford Borough Council Response

The council notes that no different growth options were proposed as alternatives.

### 5.I) Do you think that it is appropriate that at least one Garden Community should be incorporated into the New Local Plan?

Response	Count
Agree / Yes	22
Disagree / No	22
Neutral/Other Comments	9
No View Expressed	128
<b>Total</b>	<b>181</b>

**Responses were received from the following respondents:** 17, 19, 22, 24, 26, 30, 36, 42, 54, 55, 56, 57, 58, 62, 63, 64, 66, 67, 68, 69, 70, 71, 74, 75, 76, 78, 79, 80, 82, 83, 86, 88, 89, 91, 92, 94, 98, 100, 101, 102, 103, 106, 111, 112, 120, 127, 128, 130, 156, 162, 165, 168, 181

### Summary of Responses

At this stage of the plan-making process there was no clear majority view in respect of whether a Garden Community should, or should not, be incorporated into the local plan with nine respondents reserving judgement until other factors, including further evidence and the required scale of development, are clarified.

Whilst no clear majority view emerged in response to this question a number of themes emerged for the council to take into account during its consideration of a potential Garden Community:

- It would be preferable for a Garden Community to utilise brownfield land where possible rather than agricultural land.
- The need for the scheme to ensure a balanced community with housing, employment and services.
- Wherever possible the benefit of existing infrastructure and facilities should be maximised.
- The new settlement must be shown to offer benefits in terms of climate change objectives that cannot be met equally by growing the existing urban network.
- The need for the council to be realistic in terms of commencement dates and delivery rates for any new development at a Garden Community.
- The financial viability of such a scheme.
- The need for local and national political and financial support for such a scheme.
- That development at a Garden Community should not lead to the drawing away of investment from other parts of the borough.

## Stafford Borough Council Response

Stafford Borough Council accepts that the need for a Garden Community will be determined by a range of factors, e.g. selected housing requirement and spatial strategy option. The Preferred Option will include whether a Garden Community is to be adopted as part of the local plan, and if so, where this will be situated.

### 5.J) What combination of the following four factors should Stafford borough put forward at its Preferred Options at the next stage of the Plan Making Process?

1. Growth Option Scenario
2. Partial Catch Up (PCU)
3. Discount (Dis)
4. Garden Community (GC)

Preferred Growth Scenario	No. of Responses	PCU: Yes	PCU: No	PCU: No Reply	Dis: Yes	Dis: No	Dis: No Reply	GC: Yes	GC: No	GC: No Reply
A	3	1	2	0	3	0	0	2	1	0
D	3	2	1	0	3	0	0	1	2	0
E	18	16	0	2	8	10	0	12	6	0
F	5	5	0	0	0	5	0	0	5	0
G	5	4	1	0	4	1	0	3	2	0
Any of/or a combination of E, F, G	14	12	2	0	7	5	2	7	5	2
No specified scenario	1	1	0	0	0	1	0	0	1	0

The above table shows the responses received to this question and the combination of factors these respondents favoured.

There were a total of 54 responses to this question, with 49 respondents expressing a preferred combination of options. The remaining 4 responses either only expressed an opinion for one factor, such as discount, or provided other comments.

**Responses were received from the following respondents:** 3, 8, 12, 17, 19, 24, 26, 30, 39, 54, 55, 56, 57, 58, 61, 62, 64, 66, 67, 68, 69, 70, 71, 74, 75, 76, 77, 79, 80, 81, 83, 86, 87, 88, 89, 91, 93, 94, 97, 98, 99, 100, 101, 102, 103, 106, 110, 111, 162, 165, 168, 172, 181

### Summary of Responses

It can be seen from the above that the majority of those responding to this question favoured the higher growth levels expressed by Options E, F or G though, in turn, the majority of those expressing this view were from the development industry or were landowners. Amongst this group it is equally noticeable that the concept of a Partial Catch Up (PCU) adjustment was well received but that there was no majority as to whether or not the current commitments should be discounted. On balance this

group favoured the inclusion of a Garden Community, with a small number reserving judgement on this issue until more evidence is available.

Amongst those favouring Option A (the number suggested by the governments current housing requirement methodology) there is no clear trend except that there was strong agreement that the current commitments should be discounted.

The other comments received for this question were as follows:

- All of the factors should be considered.
- Utilising a discount for the crossover between plan periods and anticipated housing delivery within this time period would reduce the new plan's over commitment on housing target and thus reduce the scale of new development required, and pressures faced on existing infrastructure. (This respondent did not express any preference for the other factors).
- One respondent felt that it is not possible to make informed judgements from an environmental perspective on additional or best spatial options at this stage because the sustainability appraisal is incomplete, and all available and required evidence base information, such as the Nature Recovery Network mapping, has not been used to assess the scenarios.
- None of these. A new calculation of need and a proposal based on sustainability and the challenges of the climate emergency is required.

### **Stafford Borough Council Response**

Stafford Borough Council notes the suggested balance of these factors which have been considered in the preparation of the Preferred Option.

### **5.K) Do you consider the EHDNA recommendations for an Employment Land requirement of between 61-181ha with a 30% (B1a and b): 70% (B1c/B2/B8) split reasonable? If not, what would you suggest and why?**

There were a total of 13 responses to this question, with 11 in support and 2 providing other comments.

**Responses were received from the following respondents:** 17, 22, 24, 26, 30, 54, 55, 61, 65, 86, 120, 162, 168

### **Summary of Responses**

Of the 13 respondents commenting on this question, 11 respondents all agreed that the range of employment land requirements proposed by the Economic and Housing Development Needs Assessment (68-181ha) was appropriate. No clear view emerged as to the supported level of employment land and no respondents suggested an employment land requirement outside of this range.



The only comment in respect of the use order split of employment land was supportive of the EHDNA proposed split unless there was any evidence to the contrary. However, another respondent suggested the EHDNA was flawed since it did not take into account climate change factors.

### **Stafford Borough Council Response**

Stafford Borough Council welcomes the support for the proposed employment land requirements detailed by the EHDNA. The council will propose a precise employment requirement as part of the Preferred Option.

### **5.L) Do you agree that the assumptions made in the EHDNA about the need to replace future losses of employment land are reasonable?**

<b>Response</b>	<b>Count</b>
Agree / Yes	13
Disagree / No	3
Other Comments	2
No View Expressed	163
<b>Total</b>	<b>181</b>

**Responses were received from the following respondents:** 3, 17, 22, 24, 26, 30, 54, 55, 61, 65, 74, 75, 86, 98, 101, 102, 103, 162

### **Summary of Responses**

As can be seen above there was support amongst those responding to this question for the need to replace future losses of employment land. Issues mentioned related to:

- The need to accommodate changing employment patterns and requirements, and to reuse the redundant brownfield land for other purposes including residential.
- The scale of the allowance and whether the future loss allowance of 48ha is reasonable.
- The balance of uses, especially offices, on new sites in light of changing work practices.
- The concern that the EHDNA provides insufficient detail on the past losses data on which it is based and needs to be clearer why the underlying factors causing such changes would be expected to continue into the future.

One of the “Other” responses raised the concern that productive agricultural land may be lost by the granting of employment permissions on land adjacent to settlements and elsewhere. It was suggested this could instead be directed towards unused commercial property in Stafford town.

## Stafford Borough Council Response

Stafford Borough Council welcomes the support for the need to replace future employment land losses detailed by the EHDNA. The council will propose a precise replacement requirement as part of the Preferred Option.

### 5.M) Should the New Plan broadly mirror the spatial distribution for new employment prescribed by the current Plan?

Response	Count
Agree / Yes	14
Disagree / No	4
Other Comments	1
No View Expressed	162
<b>Total</b>	<b>181</b>

Responses were received from the following respondents: 3, 17, 22, 24, 26, 34, 54, 55, 61, 63, 65, 74, 75, 86, 98, 101, 102, 103, 162

### Summary of Responses

- A number of responses emphasised the need to ensure the sustainability of employment allocations via proximity and / or accessibility to residential development. Associated with this, one response commented on the lack of employment opportunity in the smaller settlements in the borough.
- Should a Garden Community be incorporated into the local plan a number of responses stated that there should be an appropriate amount of employment land included at the Garden Community and as such, depending on scale, the distribution of employment land would need to be adjusted in light of this.
- The most common disagreement with the distribution proposed was that employment land should be further concentrated at the main settlements of Stafford and Stone, as a lot of the current supply is located to the north of the borough away from Stafford.
- In making comments on behalf of their landowner clients two responses advocated specific development outside of the settlement hierarchy. One at Moorfields Industrial Estate (Cotes Heath) and the second at the Meaford Power Station site north of Stone in the Green Belt.
- One respondent queried whether any further development should be permitted at Raleigh Hall due to climate change and recent flooding.

## Stafford Borough Council Response

Stafford Borough Council welcomes the support for the proposed broad spatial distribution of employment land. The spatial distribution will be proposed as part of the Preferred Option.

**5.N) Do you consider the employment distribution proposed by Table 5.9 for a New Plan without and with a Garden Community / Major Urban Extension to be reasonable?**

<b>Response</b>	<b>Count</b>
Reasonable	5
Not Reasonable / Changes Suggested	7
More Information Required	1
No View Expressed	168
<b>Total</b>	<b>181</b>

**Responses were received from the following respondents:** 17, 22, 24, 29, 54, 55, 61, 65, 83, 86, 98, 113, 162

**Summary of Responses**

- One response specifically alluded to the potential economic stimulus that might be provided by a Garden Community and suggested that, in light of the high take up rates in the borough, consideration should be given to a higher amount of employment land, should a Garden Community be proposed. This might be via new sites, extensions to existing sites and / or sites within the Garden Community.
- A number of responses pointed towards the attractiveness of Stone in respect of the provision of employment land and that the distribution should reflect this. This attractiveness was also suggested to be enhanced by HS2 and the potential of a Garden Community in the area.
- A number of responses maintained that, due to its pre-eminence in the borough, Stafford should continue to receive a large proportion of employment development.
- Two responses expressed concern that the amount and phasing of employment land proposed for the Garden Community could lead to an over-dependence and consequent under-delivery of employment land. One of these responses further suggested that the Recognised Industrial Estates could support the delivery of the required amount of employment land within the entire plan period.

**Stafford Borough Council Response**

Stafford Borough Council notes the comments made in respect of the employment land distribution in the event of a Garden Community being progressed. These have been considered in the preparation of the Preferred Option.

**5.O) Are there any additional sites over and above those considered by the SHELAA that should be considered for development? (If so please provide full details via a Call for Sites form.)**

A total of 31 respondents made representations in respect of this issue.

**Responses were received from the following respondents:** 8, 17, 19, 22, 24, 26, 44, 54, 55, 58, 61, 62, 65, 74, 75, 76, 77, 80, 87, 93, 94, 95, 99, 100, 101, 102, 103, 104, 106, 107, 110

**Summary of Responses**

A small number of additional sites came forward through the consultation. The proposers have provided the required information via the “Call for Sites” form.

**Stafford Borough Council Response**

All sites submitted via the consultation have been followed up and a formal Call for Sites submission form requested if not already submitted to the council. These have been included in Strategic Housing and Employment Land Availability Assessment (SHELAA) 2022 Update which was published in August 2022.

The council has considered these sites for allocation along with all other sites in the SHELAA 2022 Update, using the full site selection methodology. The site selection methodology forms the basis of the proposed site allocations to be included in the Preferred Option.

**5.P) Do you agree that settlements of fewer than 50 dwellings should not have a settlement boundary?**

Of the 17 responses received on this matter there was a fairly even split between whether smaller settlements (which have less than 50 dwellings) should or should not have a settlement boundary.

**Responses were received from the following respondents:** 3, 11, 17, 22, 26, 39, 53, 54, 58, 64, 89, 92, 100, 112, 119, 162, 172

**Summary of Responses**

Those in favour of the introduction of settlement boundaries suggested that:

- It would be beneficial in allowing small-scale, locally driven, proportionate development to enable the organic growth of these villages and, potentially, the accrual of some community benefit.
- The settlement boundary would provide clarity in respect of acceptable scale and location of development in the settlement.

- Other responses commented that the introduction of settlement boundaries for these smaller settlements would help to prevent encroachment into surrounding countryside and the protection of natural resources.

Those arguing against the introduction of settlement boundaries in such smaller settlements fell into two broad categories:

- Those (typically individuals) who considered that the lack of a settlement boundary would protect the existing settlement from any development.
- Those (typically developers) who considered that this would permit a flexible approach to growth within and on the edge of villages since there would not be blanket policies which may act to unnecessarily restrain sustainable growth opportunities on the edge of settlements.

### **Stafford Borough Council Response**

Stafford Borough Council notes the comments made which have been considered in the preparation of the Preferred Option.

### **5.Q) Do you agree with the methodology used to define settlement boundaries?**

<b>Response</b>	<b>Count</b>
Supportive / Broadly Supportive	11
Opposed	11
Neutral but specific comments	9
No View Expressed	150
<b>Total</b>	<b>181</b>

**Responses were received from the following respondents:** 3, 17, 22, 25, 26, 29, 36, 37, 39, 42, 53, 57, 58, 61, 77, 80, 81, 87, 88, 89, 92, 94, 97, 98, 99, 107, 112, 130, 162, 165, 172

### **Summary of Responses**

Key comments made by those opposing the methodology were the suggestions that:

- Settlement boundaries should be determined on a case-by-case basis. Settlement boundaries have largely prohibited development in rural communities, except for infill. It was viewed as being important that this does not continue to happen.
- The proposed methodology does not explicitly address treatment of sites not immediately adjacent to settlements which were suggested should be considered for development.
- A respondent considered that the approach to settlement boundaries and site options appears confused, illogical and in some respects inappropriate. The following approach was suggested:

- 1) Define full extent of settlements as they currently stand (using desk-based analysis and site visits) and make provision for committed developments that are deliverable but have not yet started or completed.
  - 2) Define its settlement hierarchy.
  - 3) Determine its housing and employment development requirements.
  - 4) Determine its spatial strategy.
  - 5) Identify site options having regard to steps 3 and 4.
  - 6) Assess all options in a robust, consistent and transparent way for suitability, availability, achievability and / or developability; and
  - 7) Identify its preferred site options and then define revised settlement boundaries that account for the development of proposed site allocations.
- One respondent did not support the exclusion of open areas of land on the edge settlements from being included within the development boundary since this renders such sites contrary to planning policy and therefore unsuitable for development.
  - One respondent did not support the use of settlement boundaries if these exclude otherwise sustainable development from coming forward.

A number of key comments were made by those neither explicitly agreeing nor disagreeing with the proposed methodology. These included:

- Reinforcement that settlement boundaries should exclude separate, neighbouring hamlets, and open countryside, including isolated residences between developed settlements.
- That settlement boundaries proposed in the local plan should respect those contained in neighbourhood plans.
- That school playing fields should be protected and only built on in exceptional cases or perhaps if a school closes.
- Settlement boundaries should allow perimeter infill to sensible features rather than being tightly constrained to prohibit smaller developments.
- That the potential offered by agricultural farmsteads and horticultural sites could provide a valuable brownfield resource that could provide rural housing and employment opportunities.
- Where sites are considered for allocation for development, its proximity to existing livestock units must be examined. It was suggested that sites in near proximity to an existing livestock unit should not be allocated for residential development due to the noise, odour and potential conflict arising from the existing use.
- A number of respondents questioned the council's suggestion that Rural Exception Sites on the edge of settlements would not be included within the settlement boundary, but their location should be identified. The council stated that this was to protect them from conversion to market housing development

(Issues and Options, para 5.96). It was suggested that it appeared the Local Authority are trying to remove the Rural Exception sites from planning policy, which it was further suggested does not adhere to national guidance.

- Also, in respect of Rural Exception Sites it was suggested that land up to the exception sites on the edge of settlements is included, so that, if a Garden Community is not pursued, a greater allocation to the existing communities could be achieved.
- The methodology should consider the presence of all Local Wildlife Sites, not just Sites of Biological Importance. Many Biodiversity Alert Sites can be of higher value than their current designation level if they have not been recently assessed.
- There should be some flexibility in small settlements for some infill.
- For site selection of residential and employment development, Natural England expects sufficient evidence to be provided, through the Sustainability Appraisal (SA) and Habitat Regulation Assessment (HRA), to justify the site selection process and to ensure sites of least environmental value are selected.
- The suggestion that settlement boundaries can be very helpful in determining the broad areas where certain policies apply, and they can be used to prevent unplanned ribbon development.
- One respondent suggested that the use of settlement boundaries should be treated with a high degree of caution. The respondent further wrote that *“It has been held in various court rulings and appeal decisions (particularly Julian Wood v SoS and Gravesham borough Council [2015]) that such boundaries may not necessarily reflect the position on the ground and should not be used to prevent development that is otherwise sustainable in every other respect. There are numerous examples where councils have used settlement boundary policies to prevent development for no other reason than falling on the wrong side of the line. Whether development should be allowed on the opposite side of a settlement boundary or not should not rest on whether the council can demonstrate a 5-year housing land supply. The numerous appeal decisions allowing development in those circumstances make that point clear, yet the practice of using settlement boundaries to prevent otherwise acceptable development persists.”*
- Several responses from landowners, developers or their agents specifically promoted their sites. Whether the site had been included or excluded often appeared to form the basis of their agreement or disagreement with the methodology.

### **Stafford Borough Council Response**

Stafford Borough Council welcomes the support for the approach taken in the preparation of the settlement boundaries but equally notes the comments made for

improvement. The council have considered these in the preparation of the settlement boundaries which will be proposed as part of the Preferred Option.



## **Section 6 – Delivering Economic Prosperity**

### **6.Aa) What level of employment space provision for the Plan Period 2020-2040 do you consider to be optimal?**

A total of 14 respondents made representations in respect of this issue.

**Responses were received from the following respondents:** 3, 8, 22, 24, 28, 30, 33, 39, 89, 98, 100, 105, 162, 181

#### **Summary of Responses**

Although the response level to this section in general was limited, the majority of responses received to this question suggested a level of employment land provision in proportion with supporting the growth agenda of the council with Scenarios 2 and 3 receiving equal support and one suggesting that higher levels of employment land provision was required.

Other responses to this question raised the following points:

- A fundamental view that the pursuit of economic growth is unsustainable and in contradiction to the Climate Change emergency declaration.
- The need for green development and landscaping of employment sites.
- A suggested need to review the Green Belt in order to maximise the benefit of the Major Developed Site at Meaford.
- The need for infrastructure improvement, i.e. roads, to support the Ladfordfields and Raleigh Hall Recognised Industrial Estates.
- The potential impact of the Covid-19 pandemic on the need for employment sites and to recognise different working patterns arising from this.

#### **Stafford Borough Council Response**

Stafford Borough Council notes the support for the growth agenda and the recognition of the need for additional employment land to be allocated. The council also notes the range of other points made and will consider these in due course.

### **6.Ab) Do you consider the distribution between business classes proposed by Table 6.1 appropriate? Please explain your answer.**

**Responses were received from the following respondents:** 3, 24, 65, 162

#### **Summary of Responses**

Only 4 responses were received in respect of this question so it is therefore difficult to draw any conclusions. The responses received appeared broadly supportive of the proposed sectoral distribution although some caution was expressed in respect of the level of provision for offices, which was thought by some to be susceptible to a

reduction / slowing of demand owing to already established trends exacerbated by the Covid-19 pandemic.

### **Stafford Borough Council Response**

Stafford Borough Council notes the support (although limited) for the proposed business class distribution.

### **6.B) To ensure optimal economic prosperity, do you consider that the Council should:**

#### **6.Ba) Allocate employment land so that it extends existing employment premises / areas in the borough?**

There were a total of 11 responses to this question, with 9 in support and 2 against.

#### **6.Bb) Allocate employment in both urban and rural areas?**

There were a total of 7 responses to this question, with 6 in support and 1 against.

Please note, not all respondents listed below answered both of the above questions.

**Responses were received from the following respondents:** 3, 19, 50, 54, 63, 65, 92, 96, 98, 120, 162, 175

### **Summary of Responses**

No explanations were given by the majority of respondents in respect of their answers to these questions but the propositions that the council should (a) consider extending existing employment areas; and (b) allocate employment in both rural and urban areas were supported.

Some respondents suggested that sites in Stafford Town should be redeveloped before allocating and constructing new sites.

### **Stafford Borough Council Response**

Stafford Borough Council notes the support for the proposed employment land distribution.

### **6.C) Which specific locations (if any) do you think would benefit from the increased provision of employment premises?**

A total of 14 respondents made representations in respect of this issue.

**Responses were received from the following respondents:** 3, 8, 22, 24, 30, 36, 63, 65, 92, 96, 98, 107, 162, 170

## Summary of Responses

Suggestions for the location of additional employment provision were:

- Several respondents suggested the expansion of existing employment areas, i.e. industrial estates, to incorporate all types of employment development and to diversify their offer. A further response highlighted the importance of these sites to the rural economy and provision of local employment.
- One respondent, in advocating Meecebrook highlighted its potential as a “self-contained” sustainable development.
- Concern was expressed by one respondent in respect of perceived unsuitable road widths leading to Ladfordfields and Raleigh Hall, and suggested that any expansion which creates additional HGV traffic should be curtailed until there are major road improvements between the sites and J14 of M6 with future use restricted to office only.
- Two respondents similarly advocated an extension to the airfield employment site at Hixon as part of a Garden Community whilst a further response advocated a site of 3.8 hectares at Weston for an expansion of the existing operation or for new business.
- One further respondent from Hixon reiterated the opposition to any development at the village.
- Two respondents advocated the re-use of under-utilised Stafford town centre premises.
- There was some discussion in respect of the Stone area and the need to address a perceived current shortage of employment land. Three specific examples were suggested by separate respondents:
  - The improved utilisation of the Meaford.
  - The extension of the employment site further south along the A34 beyond the new JLR car storage facility.
  - Forge Farm, Stone.
- The response from the MOD was supportive of the borough considering uses other than Class B, in particular, Defence. It was stated that the MOD would like to see recognition of, and support for Defence related development within the local plan which would accord with para 95 of NPPF.
- One response suggested employment development at Pasturefields and the M6 Junction 13 but accepted that cooperation with South Staffordshire would be required and for a suitable allocation to be made in their plan. The cited benefit of this is that such a scheme is near to the proposed new rail hub near Gailey as well as the motorway junction.

## Stafford Borough Council Response

Stafford Borough Council notes the comments made and have considered these in the preparation of the Preferred Option.

## **6.D) In allocating employment land should the Council consider a zoning approach in order to encourage higher value-added activities?**

There were a total of 6 responses to this question, with 4 in support and 2 against.

**Responses were received from the following respondents:** 3, 29, 54, 92, 98, 162

### **Summary of Responses**

There were a limited number of extended comments in response to this question (the majority were a simple “yes” or “no”) but those that were made tended to be supportive of a zonal approach which perceived merit in trying to attract “higher value” activities and is consequently positive in terms of realising the aspirations of the vision for the borough, supporting and lifting levels of leisure and social activity in the town centres, and potentially encouraging a higher quality of residential development.

The extended comments made related to the following:

- Reference was made to the changing nature of employment, especially the trend towards online retail, the need for warehousing space, and the need for flexible employment space to meet evolving and changing needs.
- A cautionary note was expressed by one respondent, suggesting that an over-specific allocation for employment in terms of use class can constrain or slow down the delivery of new employment opportunities because a new type of employment development might be contrary to a particular policy or allocation within a development plan that is adopted a few years prior. It was therefore suggested that such a zoning approach might consider any Class B activity and other forms of development outside of Class B uses that generate significant levels of employment could be allowed, subject to there being robust evidence submitted with any non-Class B use, to demonstrate the levels of employment that would be provided. This, it was suggested, would give the planning process a greater degree of flexibility to respond to a constantly changing economy.
- Conversely a further respondent stated that it is important that, where the council wishes to see high-quality employment, sites are safeguarded for these uses. Otherwise, appropriate sites may be taken up by other employment uses which are more expedient. The aim must be to allocate land to reflect the overall objectives of the employment strategy and not necessarily simply reflect short term commercial requirements, although enough land needs to be provided to meet these commercial requirements.
- One respondent stated that they would prefer to zone potentially unpleasant uses such as metal recycling, composting activities, noisy manufactures, toxic waste producers etc.
- A further cautionary note was struck by Staffordshire County Council who stated the need to ensure that any zone does not conflict with the aims of

Policy 2.3 of the Waste Local Plan which directs the development of new waste management facilities to general industrial land (including urban and rural general industrial estates (alongside B2 and B8 uses)). It therefore relies on the continued provision of adequate supplies of B2 / B8 land in the locations where new waste management facilities are required.

### **Stafford Borough Council Response**

Stafford Borough Council notes the apparent support for some form of zoning along with the more specific comments made. The council also notes the cautionary advice from the County Council in respect of its role as the responsible waste authority.

### **6.E) Should the Council propose a policy preventing the redevelopment of employment premises to residential units? If so, should the scope of such a policy be limited in any way?**

There were a total of 11 responses to this question, with 6 in support, 4 against and 1 providing other comments.

**Responses were received from the following respondents:** 3, 19, 22, 24, 28, 54, 92, 109, 119, 120, 162

### **Summary of Responses**

As with question 6D, there were a limited number of extended comments in response to this question, with the majority expressing some conditional support for a restrictive approach. Comments made included:

- The present scale of land with good employment potential lost to other activities undermines the careful planning that is done for the benefit of the whole borough. The lack of standards for industrial units being turned into dwellings needs to be addressed.
- That such protection should be conditional on location e.g. only in non-urban settings. Specific concern was expressed in respect of the loss of employment premises in rural areas.
- Concern that the lack of such restriction would result in a “back-door” means for developers to have poor quality conversions granted.
- That any conversion should only be conducted on genuinely redundant premises, rather than temporarily empty, where the land is no longer appropriate for employment, or is no longer viable and this has been tested by a period of open marketing.
- The need to ensure a continuing balance of housing and employment uses.
- Some respondents raised the point that employment premises which are unused for a period of time are better used for housing than lying empty, with reference to unused shops in town centres rather than industrial units, as this would be an improvement.

- Another respondent urged caution and considerable scope to limit the proposed policy, as some sites may be better used for housing and particularly, older persons housing. If the council proposed such a policy, it should be drafted in such a way to allow a considered and flexible judgement to be made as to whether or not a proposal is acceptable.

### **Stafford Borough Council Response**

Stafford Borough Council notes the concern expressed in respect of the loss of employment land and premises for residential purposes.

### **6.Fa) Where do you consider small and medium size units should be made available?**

A total of 8 respondents made representations in respect of this issue.

**Responses were received from the following respondents:** 22, 24, 54, 63, 92, 96, 162, 168

### **Summary of Responses**

- In terms of generic location such units should be made available within sites that include larger units to support sustainable infrastructure.
- With the increased amount of home working in a wide range of activities greater policy flexibility should be permitted to allow this.
- Small and Medium-sized units can be appropriate within smaller communities and within mixed use areas, but pressure for housing often displaces these uses to fringe estates which may be less accessible. Policies to require a mix of uses within the urban area and within specific growth locations can help ensure a more sustainable pattern of development, and also create more vibrant and dynamic places.
- Small and medium sized units should be available in rural areas in reasonable proximity to settlements and with good access onto the main roads.
- Provision should be made for low-cost start-ups for shops and offices in or near town centres to encourage small local businesses, with help via business rate relief and business support networks.

In terms of location-specific comments:

- The recently implemented starter units at Moorfields Industrial Estate have been extremely popular with demand to provide more small and medium sized units, both for new tenants, and for existing tenants looking to expand their business.

## **Stafford Borough Council Response**

Stafford Borough Council notes the comments made in respect of the location and nature of small and medium business units, and the need for these to relate to both rural and town centre contexts.

### **6.Fb) Do you consider there are any other issues relating to building type and size which may be potentially restricting economic opportunity within the borough?**

**Responses were received from the following respondents:** 28, 54, 92

#### **Summary of Responses**

3 comments were made in response to this question suggesting that:

- There is a need to review the mix of business premises available to start-up businesses who may be looking to make that first step in moving a business from residential to commercial premises. In particular more business incubation space spread evenly across the borough.
- Building type and size should not be restricted but rather guided by market requirements and also local setting / locational issues. Industrial Estate large distribution units should be situated close to motorway junctions and smaller units disbursed throughout the borough.
- The plan needs to provide sufficient land to meet the variety of employment land and building requirements, and ensure there are sufficient choices for employers to locate where they feel best able to meet their customers' needs. Restricting growth in certain sectors, such as B8, may be detrimental to the performance of the economy.

## **Stafford Borough Council Response**

Stafford Borough Council notes the comments made.

### **6.Ga) Do you consider that a lack of suitable office space is a potential barrier to inward investment within the borough?**

There were a total of 5 responses to this question, with 1 in support and 4 against.

**Responses were received from the following respondents:** 54, 92, 162, 175, 181

#### **Summary of Responses**

Although there were only 5 responses to this question there was a strong consensus among these that there is not a lack of office space in the Borough. No extended comments were made.

## **Stafford Borough Council Response**

Stafford Borough Council notes the responses.

### **6.Gb) Where should the council seek to encourage the development of modern office space? Please explain the rationale for your answer.**

A total of 9 respondents made representations in respect of this issue.

**Responses were received from the following respondents:** 3, 22, 24, 54, 92, 96, 162, 175, 181

### **Summary of Responses**

The key themes from the responses were as follows:

- In light of the changing working practices, in particular the increase in home working, accelerated by the Covid-19 pandemic, there was some scepticism amongst a number of respondents of the need for more office space with a number of respondents highlighting the amount of empty office space that already exists in the borough and whether this could be refurbished.
- The potential need for modern high-quality, purpose-built office accommodation was recognised by a small number of respondents, with one suggesting that sites should be safeguarded for this purpose. It was further suggested that the amounts and locations must reflect assessments of the potential, and the plan can be an instrument in encouraging a greater proportion of offices. The plan can lead the market as well as follow, supported by a proactive economic development strategy.
- One respondent suggested that in rural areas farms diversifying into providing small office accommodation would help agricultural units by providing a more stable income stream than is available from agriculture.

## **Stafford Borough Council Response**

Stafford Borough Council notes the comments made.

### **6.H) To assist the rural economy should the Council:**

- a) Allocate land for employment purposes throughout the rural areas of the borough?**
- b) If so, which area(s) do you consider would be appropriate for this purpose? Extend existing rural business parks? If so which ones?**

A total of 7 respondents made representations in respect of this issue.

**Responses were received from the following respondents:** 24, 50, 65, 84, 92, 98, 172



## Summary of Responses

There was no clear agreement between the respondents, with following points being made:

- One respondent suggested that redundant farmyards are a suitable opportunity for conversion to employment development.
- One respondent, citing work done for the Hixon Neighbourhood Plan, contested that employment sites in rural areas provide suitable employment for people living in the immediate area, suggesting that travel to work patterns are not improved.
- One respondent suggested that settlement boundaries should be increased and also include employment provision requirements. Existing rural business parks and industrial site should be expanded, and policy should be reviewed to allow for the creation of new ones.
- Several respondents suggested that the boundaries of appropriate business parks, business villages and Recognised Industrial Estates should be extended but ensure that these are defensible, as this would provide opportunities for new investment.

## Stafford Borough Council Response

Stafford Borough Council notes the comments made.

### 6.I) To assist the rural economy, should the Council:

#### 6.Ia) Seek to allow for the expansion of rural business premises where this might be otherwise restricted by the relevant planning policies?

A total of 13 respondents made representations in respect of this issue.

**Responses were received from the following respondents:** 3, 6, 22, 24, 25, 29, 45, 54, 63, 92, 162, 168, 172

## Summary of Responses

Amongst the responses to this question there was a broad agreement to the principle of the expansion of rural business premises where this might be otherwise restricted by the relevant planning policies. Such agreement tended to be qualified with the following types of comments:

- Any policy should be supported by an assessment of need.
- Expansion of rural business premises is often essential to ensure that such communities remain viable and sustainable places to live and work, and are not just picturesque dormitories for those who work in nearby towns and cities.
- That the principle should be limited to only local enterprises.

- That some of the demand for rural employment could be accommodated by a more liberal planning approach to the re-use of redundant residential and employment buildings. This to include the letting out of portions of these buildings where the other part is still used for the original purpose.
- That support should be included for agricultural and food producing businesses.
- That appropriate consideration still needs to be given to landscape issues especially in respect of the Area of Outstanding Natural Beauty (see especially Local Plan Policy N7 Cannock Chase AONB).
- That greater flexibility would be required by the council in respect of permitting development in Conservation Areas.
- The need for local supporting infrastructure (e.g. roads, adjacent parking, broadband).
- It was suggested that reference should be made to the Historic Farmsteads Guidance produced by Staffordshire County Council in conjunction with Historic England. If consideration is being given to the expansion of rural business premises this could include the development and adaptation of historic farmsteads. The aforementioned guidance may assist in identifying where this might be appropriate or not. Historic farmsteads and known and unknown below ground archaeology should be included here.

Some concern was expressed at:

- The potential additional loss of green fields
- The need to encourage new sectors to the borough based on the area's extensive countryside, agriculture / farming should be encouraged and supported, as well as wildlife, craft, and historical attractions.
- In addition, development was advocated at two specific sites, Brocton and the Moorfields Industrial Estate.

### **Stafford Borough Council Response**

Stafford Borough Council notes the comments made.

### **6.Ib) Propose a policy stipulating the installation of super-fast broadband to all new business development in the rural areas of the borough?**

There were a total of 7 responses to this question, with 6 in support and 1 against.

**Responses were received from the following respondents:** 3, 19, 25, 54, 92, 119, 162,

## **Summary of Responses**

Suggestions were made that the Community Infrastructure Levy could be utilised to lever the provision of super-fast broadband in rural areas and Mobile coverage should also be considered.

## **Stafford Borough Council Response**

Stafford Borough Council notes the comments made.

## **6.J) To assist the rural economy should the Council consider a policy stipulating the installation of super-fast broadband throughout the rural areas of the borough?**

There were a total of 10 responses to this question, with 8 in support and 2 against.

**Responses were received from the following respondents:** 3, 19, 22, 24, 25, 28, 92, 119, 120, 162

## **Summary of Responses**

To encourage rural businesses and the ability for effective remote working, especially in the wake of post Covid, the policy for rural broadband was supported. Specific comments made were:

- That provision should be Fibre to the Premises which gives much faster speeds and more reliable internet service than the alternatives. This is especially important for current business and the ability to attract other businesses to the area.
- That the council, if they are serious about attracting business to and facilitating remote working in the rural areas of the borough, should consider financially supporting the provision of superfast broadband where demand can be demonstrated.
- That mobile coverage is also very patchy and the shift to 5G recognised.
- One respondent suggested that super-fast broadband should also be available for residents to facilitate those who wish to work from home for part or all of the week.

## **Stafford Borough Council Responses**

Stafford Borough Council notes the comments made but recognises the little leverage that it has over service providers.

## **6.K) Are there any further potential Major Developed Sites in the Green Belt that should be considered for inclusion? If so, please provide details.**

A total of 7 respondents made representations in respect of this issue.

**Responses were received from the following respondents:** 3, 22, 27, 63, 84, 92, 105

### **Summary of Responses**

Specific representations, with proposed site-specific policy changes, were made in respect of the three currently named Major Developed Sites (MDS) in the Green Belt:

- Hadleigh Park MDS and adjoining land
- Meaford Business Park
- Moorfields Industrial Estate

No further MDS options were proposed.

### **Stafford Borough Council Response**

Stafford Borough Council notes the comments made.

### **6.L) The Visitor Economy is considered by Policies E6 and E7 in the currently adopted Local Plan.**

#### **6.La) Do these Policies continue to be sufficient in their current form or do they need adjustment?**

A total of 14 respondents made representations in respect of this issue.

**Responses were received from the following respondents:** 1, 3, 17, 22, 24, 29, 31, 34, 37, 39, 54, 85, 92, 162

### **Summary of Responses**

The responses to this question raised a wide range of inter-relating issues:

- The importance of Tourism and Leisure to both visitors and residents was recognised in not only making Stafford Borough an attractive place to visit but also in raising the quality of life of residents via visitor destinations and cultural offers. To assist in this, it was proposed that the council should consider a more expansive policy framework to cover the wider aspects of encouraging and controlling leisure, tourism and night-time economy type uses.
- One respondent suggested that an “Old Town” be developed in the centre of Stafford around the High House and the associated alleys off the Market Square where small businesses could start-up and flourish. It was considered that this would enable many old buildings to be reverted to their earlier state via the removal of modern frontages and a more traditional appearance achieved.
- A number of responses picked out the need for commensurate town centre planning in making the borough an attractive place to live and visit,

highlighting the recent renewal of Victoria Park and the riverside in Stafford as a good example.

- One response also suggested that a well-planned Green and Blue Infrastructure plan in towns and in rural areas would be a major benefit in attracting visitors to the borough through an enhanced landscape and natural environment.
- It was suggested that policies on tourism need to encourage sustainable travel, and ensure that activities serve to enhance, not degrade, important habitats such as Cannock Chase, canal networks and wildlife sites. It was suggested therefore that the council could consider requiring development linked to tourism to contribute to green infrastructure off-site where it can benefit the wider area, the landscape and/or local nature networks. Also, in any Green Infrastructure (GI) strategy, provision of alternative green spaces where there is evidence of pressure / demand causing damage to an area. Parking in rural areas can also be an issue that impacts on road verges and damages habitats, and this should be managed by well-designed, sustainable car parking facilities that add high quality GI benefits.
- Similarly, reference was made to the importance of the historic environment through heritage tourism and town centre policy, and the consideration of opportunities via heritage assets such as listed buildings and conservation areas.
- Support for the Marina and Canal sector was expressed by several responses with a suggestion for a presumption in favour of development where there is provision for an economic case. In particular, the Inland Waterways Association and the Canal and River Trust consider that Policy E7 requires adjustment to enable a wider distribution of residential moorings particularly at marinas but also along waterways beyond settlement boundaries. Such a consideration would be in line with The Housing and Planning Act 2016 includes a duty for local housing authorities in England to *“consider the needs of people residing in or resorting to their district with respect to the provision of ... places on inland waterways where houseboats can be moored.”*
- The Trentham Estate consider that a revision to Policy E6 of the current Part 1 Plan is necessary in order for the Estate to fulfil its potential. Such a revised policy would recognise the special qualities of the natural and built environment whilst providing a policy basis for sensitive growth to ensure the sustainable future of the Estate and its numerous designated heritage assets.

### **Stafford Borough Council Response**

Stafford Borough Council notes the comments made and will work with the sector to strengthen this aspect.

## **6.Lb) Are there any Visitor Economy themes that should be more explicitly addressed?**

A total of 5 respondents made representations in respect of this issue.

**Responses were received from the following respondents:** 54, 85, 119, 120, 181

### **Summary of Responses**

The suggestions made included:

- Cultural developments
- Cycle Tourism, in particular:
  - An emphasis on safe cycle routes in the borough alongside Cannock Chase could make it a really attractive national / internationally renowned hub.
  - Seek to make use of existing under-used assets e.g. the designation of Quiet Lanes.
- Canals: one respondent felt that a lack of parking, inadequate road infrastructure and ill maintained tow paths make areas like Gnosall and Norbury Junction difficult to expand on from a tourist point of view.
- Trentham Gardens: the Estate considered that other visitor economy themes should be explored in relation to the Estate and its unique context i.e. heritage, including the restored Gardens; leisure attractions; commitment to nature conservation; and its popularity as a retail destination. The specific nature of the Estate, alongside the potential for growing it as a destination, justifies a standalone policy within the Plan.

### **Stafford Borough Council Response**

Stafford Borough Council notes the comments made.

## Section 7 – Delivering Town Centres that address future needs

### 7.Aa) Do you consider that the hierarchy for Stafford borough should consist of Stafford and Stone town centres with Eccleshall local centre?

Response	Count
Agree / Yes	13
Disagree / No	1
Other Comments	5
No View Expressed	162
<b>Total</b>	<b>181</b>

**Responses were received from the following respondents:** 3, 10, 11, 14, 17, 19, 22, 33, 54, 76, 80, 85, 86, 99, 115, 120, 130, 162, 180

#### Summary of Responses

Of the 19 respondents to this question 13 considered that the hierarchy for Stafford borough should consist of Stafford and Stone town centres with Eccleshall having a local centre. The one dissenting response considered that Trentham Retail Village should be recognised within the retail hierarchy as a Local Centre or another specific designation outside of the hierarchy of Town and Local Centres.

Concerns expressed included:

- That past policy has led to the overprovision of retail, such as out-of-centre retail and Riverside, which has led to the decline of the traditional centres. The Town Centre Capacity Assessment may lead to a continuation of this. Some scepticism was expressed that the anticipated increase in population would not justify the increase in retail provision.
- The need for frontages to be improved to enhance perception of the centres
- That the council should stop the decline and facilitate better maintenance of the public realm. Boarding up is hastening the decline. In the meantime, put up displays in empty units to reduce the feeling of decline in the centre of Stafford.
- The impact of internet shopping and services (e.g. banking) on the town centres and the need for policies and retail to adapt to this.
- The acceleration of trends caused by the Covid-19 pandemic.
- Without affordable and sufficient parking, adequate road infrastructure and reasonable business rates the development of these centres is likely to be doomed to failure.

Comments made in respect of the three named settlements in the retail hierarchy included:

- Stafford town
  - High vacancy rate of shops, offices and public buildings, e.g. the Magistrates' Courts, with many of the vacancies being long term. This has led to buildings and streets, e.g. Market Square, showing a lack of maintenance, with parts of the centre feeling run-down.
  - Comparison floorspace should not be increased, but the reuse of the vacant M&S and Co-op Department store buildings should be achieved before allowing new permissions.
  - Try to concentrate shopping outlets within the central ring-road in order to maximise potential public transport access.
  - Would benefit from the addition of independent retailers.
  - Stafford town centre needs regeneration in a way that *"is thoughtful and sensitive to the area, not just in a mixed use, one size fits all, let's put anything in there that makes a profit kind of way"*.
  - Parking and congestion identified as major issues.
- Eccleshall
  - The inclusion of Eccleshall was welcomed.
  - A very well-equipped centre with a wide range of facilities and good infrastructure routes in all directions.
  - Needs more parking to increase footfall as a centre and for the traffic congestion to be addressed.
  - One respondent felt that Eccleshall's centre should be termed a "Town Centre" rather than local centre, given the range and amount of Class A and other services that it contains. This would be more consistent with the definition in the Glossary to the NPPF and would more accurately reflect its role and the status of Eccleshall.
- There were no extended comments in respect to Stone for this question.

Other comments included:

- A greater recognition of Gnosall in view of its many characterful buildings that could be enhanced.
- To permit rural village convenience outlets if any think they could be viable.

### **Stafford Borough Council Response**

Stafford Borough Council welcomes the support for the proposed hierarchy for the borough and recognises the concern expressed for the centres in light of the impact of online retail and services, and the Covid-19 pandemic. The council also notes the comments made in respect of each of the individual settlements.

Stafford Borough Council does not believe that Trentham Retail Village performs the same role and function as a town / local centre and that therefore an enhanced



designation would be inappropriate. The council would require evidence from Trentham Retail Village to justify a different classification along with examples of where other similar retail outlet villages have been given an alternative designation to revisit this stance.

**7.Ab) Based on the evidence in the Stafford borough Town Centre Capacity Assessment do you agree with the level of future retail convenience and comparison floorspace provision?**

There were a total of 2 responses to this question.

**Responses were received from the following respondents:** 3, 99

**Summary of Responses**

One respondent disagreed with the level of future retail convenience floorspace provision and associated evidence within the Stafford Borough Town Centre Capacity Assessment, with there being significant concerns regarding a number of technical aspects and assumptions made. It was suggested that the capacity figures underestimate the level of retail capacity, and as a result it remains that Stone needs another new food store, with the respondent then proposing their site as being suitable for the location of this food store.

**Stafford Borough Council Response**

Stafford Borough Council notes the comments made, and the proposed site has been included in the SHELAA 2022 Update and considered in the site selection process.

**7. Ba) Do you consider that the future approach to the centre of Stafford, Stone and Eccleshall should be based on their respective distinctive characteristics?**

There were a total of 5 responses to this question, with 4 in support and 1 against.

**Responses were received from the following respondents:** 3, 22, 92, 99, 168

**Summary of Responses**

Whilst there was a low number responding to this question, some agreement appears to be apparent that retail policy should consider the different characters of the main centres.

**Stafford Borough Council Response**

Stafford Borough Council notes the responses.

**7.Bb) Stafford and Stone have a proposed town centre boundary as well as a Primary Shopping Area boundary, with Eccleshall having a local centre boundary. Is this appropriate?**

There were a total of 4 responses to this question, with 3 in support and 1 against.

**Responses were received from the following respondents:** 3, 22, 99, 162

**Summary of Responses**

There were very few views expressed in respect of this question with the only comment provided being the suggestion of the Eccleshall local centre boundary including the largest public building, the Holy Trinity Church.

**Stafford Borough Council Response**

Stafford Borough Council notes the comments made.

**7.Bc) For Stafford a number of new development sites are suggested within the town centre area. Do you consider these sites are sufficient to meet future needs or are there other locations?**

There were a total of 3 responses to this question.

**Responses were received from the following respondents:** 3, 22, 156

**Summary of Responses**

There were limited views expressed for this question. The comments which were received related to:

- The number of vacant buildings in the centre of Stafford and the potential for their conversion to residential use.
- The importance of returning retail to the town centres.
- The desirability of encouraging independent traders.
- Concern in respect of traffic and parking in the centres.

**Stafford Borough Council**

Stafford Borough Council notes the individual concerns expressed and also notes that no alternative locations for development were suggested.

**7.C) Do you consider that the local impact floorspace thresholds proposed for Stafford, Stone and Eccleshall to be appropriate? If not, please provide reasons for your response.**

There were 2 responses provided to this question, one in support and one in disagreement.

**Responses were received from the following respondents:** 22, 54

### **Summary of Response**

Of the two responses, the response in disagreement was questioning for Eccleshall where could the proposed floorspace be fitted.

### **Stafford Borough Council Response**

Stafford Borough Council notes the responses.

## Section 8 – Delivering Housing

### 8.A) Should the council continue to encourage the development of brownfield land over greenfield land?

Response	Count
Agree / Yes	53
Disagree / No	9
No View Expressed	119
<b>Total</b>	<b>181</b>

**Responses were received from the following respondents:** 3, 10, 11, 12, 14, 17, 19, 22, 24, 26, 27, 38, 39, 49, 53, 54, 56, 57, 58, 66, 67, 68, 69, 70, 71, 74, 75, 76, 78, 80, 81, 85, 86, 87, 89, 91, 92, 94, 95, 97, 98, 99, 100, 101, 102, 103, 104, 106, 109, 110, 111, 112, 120, 127, 130, 160, 162, 163, 166, 174, 175, 181

#### Summary of Responses

Strong support continues to be evidenced for the prioritisation of brownfield / previously developed land for development where possible. The vast majority of responses to this question were of a simple yes / no nature. However, some extended comments were made, which are summarised below:

- Areas of existing or historic flood risk can be made more resilient with additional planning policies around redevelopment on brownfield sites, with this helping to deliver benefits to the wider community.
- The RSPB raised the point that some brownfield sites are havens for wildlife and support some of the UK's most scarce and threatened species. These brownfield sites can also provide important 'wild spaces' for local communities, providing access to nature, improving health and well-being and be vital components of ecological networks.
- Staffordshire Wildlife Trust also raised a similar point that brownfield sites can often be more biodiverse than intensively farmed greenfield sites and may be more viable and beneficial to restore to an alternative use such as green space or nature conservation. The relative merits of any piece of land in terms of environmental sustainability should be considered on a site-by-site basis.
- One respondent felt that a policy to encourage the re-use of the brownfield land would appear to be sound in accordance with the NPPF. The policy should make clear that support will be given for the reuse of brownfield land in settlements, for homes, including for the elderly, and meeting identified needs. However, if a greenfield site is preferable for the use / to meet a local need, this should not be excluded.
- Another respondent agreed that development of brownfield should be prioritised over greenfield land as it prevents the loss of countryside, and these sites are the preferred location for older persons housing.

## Stafford Borough Council

Stafford Borough Council notes the comments made and welcomes this support. The comments raised by the RSPB and Staffordshire Wildlife Trust have been noted.

Additionally, the council has been in dialogue with Staffordshire Wildlife Trust who produced an Ecological Assessment which forms part of the local plan evidence base that has been used throughout the site selection process to inform the decision-making process.

### 8.B) Do you consider that the enforcement of minimum density thresholds would have a beneficial impact on development within the borough?

Response	Count
Agree / Yes	23
Disagree / No	22
Other Comments	10
No View Expressed	126
<b>Total</b>	<b>181</b>

**If so, do you consider: the implementation of a blanket density threshold; or a range of density thresholds reflective of the character of the local areas to be preferable?**

Response	Count
Blanket Density threshold	0
Range of density thresholds reflective of the character of the local area	39
None of the proposed options	3
Other Comments / No Response	13
<b>Total</b>	<b>55*</b>

\*Please note this total is the total number of respondents who responded to the first part of the question. In some cases, not every respondent responded to the second part, so these have been counted in the "Other Comments / No Response" option.

**Responses were received from the following respondents:** 3, 12, 17, 19, 22, 26, 34, 39, 40, 49, 53, 54, 57, 58, 59, 64, 66, 67, 68, 69, 70, 71, 74, 75, 76, 80, 81, 85, 86, 87, 89, 91, 92, 93, 94, 97, 98, 99, 100, 101, 102, 103, 104, 106, 110, 111, 112, 120, 126, 127, 162, 165, 166, 174, 181

### Summary of Responses

Whilst there was a fairly even number of people considering whether or not the utilisation of minimum density thresholds would be beneficial there was very strong agreement that, should the council employ minimum density thresholds, then this should be via a range of thresholds rather than via a single blanket threshold. This would enable the different contexts for development (e.g. town centre, infill within a

settlement, edge of settlement, access to sustainable travel, constraints of the site, etc) to be better accommodated.

The issues raised by respondents in respect of the enforcement of a range of minimum density thresholds included:

- Support for new development that reflects the local distinctiveness and character of an area. Such development should utilise good design that respects its local environment and history (NPPF para 185).
- In view of the diversity of the borough, in terms of housing density, one respondent suggested that density standards should be minimum standards determined by reference to the character of the local area and the housing mix as determined by local needs. Further, there should be a variety of density standards for different locations.
- Support for the stance of the consultation document which stated that it is appropriate that densities are maximised in sustainable locations with access to good public transport connections.
- Concern that the design and character of development should not be constrained by the application of a minimum density threshold, nor that new development should not be required to slavishly replicate the existing character of an area if this will result in an inefficient use of land.
- Concern was expressed at the quality and density of recent development and the size of dwellings built leading to a sense of overcrowding and lack of privacy. The respondent questioned whether minimum density thresholds would help address this.

In respect of cautionary comments for minimum density thresholds the following observations were made:

- A stated need for flexibility to reflect the character of the local areas and the type of housing with specific concern expressed in respect of emerging legislative requirement for biodiversity net gain.
- One respondent noted that it is important that the density assumptions expressed in the Strategic Housing and Employment Land Availability Assessment (SHELAA) do not constrain the development potential of sites.
- Housing mix and density are intrinsically linked and the interrelationship between density, house size (including any implications from the introduction of optional space and accessible/adaptable homes standards), house mix, and developable acreage should be considered holistically in viability assessment testing.
- One respondent suggested that whilst their preference was to not have a minimum density threshold, but should this be adopted they would prefer to see density thresholds that reflect the local character along with an exemption for the provision of bungalows in rural areas.

- One respondent advocated policy accommodation for small developments of larger dwellings that are suitable for multi-generational living and homeworking, with the suggestion that these would be most effectively located outside of the main settlements of the borough. Such developments, to address the density issue, might incorporate shared garden space and space upon which to grow produce.
- A request for guidance to assist applicants to understand the potential density thresholds reflective of the local areas and, within this, the necessary flexibility to accommodate specific site characteristics and constraints.

Those arguing against the use of minimum density thresholds suggested that:

- There is no clear evidence that this is a necessary policy or that it would deliver any particular social or economic benefit.
- There are national policy objectives to make the best use of land, whilst meeting identified needs can be served through a requirement for individual proposals to justify their density through reference to local character, townscape and other relevant considerations.
- It was suggested that sites should be considered on a site-by-site basis, having regard to local character, context and other planning policy requirements, environmental designations or constraints.
- A suggestion that minimum density standards would impact negatively on the standard of development.
- One respondent considered that the enforcement of minimum density thresholds would have a negative impact on development in the borough since, in order to achieve the threshold, developments may have to be designed in a way that are alien to the locality in which they sit and are often poorly provided with parking, which despite aspirations to reduce car use will, realistically, be an issue for most of the new Plan period.

### **Stafford Borough Council Response**

Stafford Borough Council notes the views expressed and will present its proposed approach in the Preferred Option.

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

<b>Response</b>	<b>Count</b>
Agree / Yes	26
Disagree / No	5
No View Expressed	150
<b>Total</b>	<b>181</b>

**Responses were received from the following respondents:** 3, 17, 22, 26, 27, 49, 53, 54, 57, 58, 66, 67, 68, 69, 70, 71, 74, 75, 80, 81, 92, 93, 94, 102, 103, 104, 106, 110, 112, 162, 174

### Summary of Responses

There was a common acceptance amongst those commenting upon this issue that locations with good access to sustainable travel are able to support higher density development. There were no extended comments from those who disagreed.

### Stafford Borough Council Response

Stafford Borough Council notes the responses.

**8.D) Do you consider that the adoption of the Nationally Described Space Standards would work to increase housing standards, and therefore enhance the health and well-being of local residents?**

Response	Count
Agree / Yes	10
Disagree / No	21
No View Expressed	150
<b>Total</b>	<b>181</b>

**8.E) In the new Local Plan how should the Council apply the Nationally Described Space Standards? Please explain your answer.**

Question	Yes	No
8.Ea) Apply the Nationally Described Space Standards to all new dwellings, including conversion of existing buildings.	3	29
8.Eb) Only apply the Nationally Described Space Standards to new build dwellings.	5	27
8.Ec) Not apply the Nationally Described Space Standards to any development.	26	7

The responses for 8.D and 8.E have been considered together. Please note not everyone that answered 8.D, answered 8.E and vice versa.

In addition to the above tables, 4 respondents provided what has been classed as "Other Comments" for either 8.D, 8.E or both. These have been included in the summary below.

**Responses were received from the following respondents:** 3, 17, 22, 26, 27, 53, 54, 56, 57, 58, 59, 66, 67, 68, 69, 70, 71, 74, 75, 76, 80, 81, 85, 87, 89, 91, 92, 93, 94, 100, 101, 102, 103, 104, 106, 108, 111, 112, 162, 174



## Summary of Responses

There was a strong reaction against the adoption of the Nationally Described Space Standards (NDDS) with many respondents making similar points:

- That the implementation of the NDDS would need to be supported by locally derived evidence to justify this (NPPF Para 127 Footnote 46).
- That for these NDDS to be carried forward in policy in the way proposed they should be integrated into the Building Regulation system.
- That NDSS requirements are quite high and typically add 10sqm to the size of a house, so there are implications in relation to land requirements and development costs. One respondent suggested setting a minimum standard of floor area of at least 85% of NDSS is more realistic.
- That the additional costs incurred by developers because of the larger dwellings that would result, would not be recouped and would therefore be a disincentive to developers.
- That because of the larger dwellings a lower density would result. This would mean a greater amount of land take for development.
- That the imposition of different standards would constrain the technical feasibility and viability of development.
- That such an approach would be a “one size fits all” approach which in turn would discourage a site-by-site consideration of requirements.
- That such an approach would make the provision of affordable housing less viable.
- That flexibility is required, and this is particularly relevant for brownfield and more constrained sites including the conversion of properties in a heritage context.

Points made in favour of the implementation of the Nationally Described Space Standards (NDDS) related to:

- That utilisation of the NDDS would stop developers using Permitted Development Rights to convert office buildings to residential use that have created conversions of low quality.
- The preservation of local character.
- Where there was support for the implementation of the NDDS this was often “conditional” e.g. only for new build or to include conversions from offices to residential.
- The cramped nature of much new development and lessons that could be learnt from development on the continent (e.g. fewer more spacious rooms).

Some respondents didn't offer a definitive Yes or No to response 8.D, so these have been counted in the “Other Comments”, but these generally reiterated the point of there needing to be evidence of needs, viability testing and flexibility if applied.

A number of respondents suggested that the new Plan might more appropriately make reference to the NDDS as a guideline for assessing development proposals.

Other comments related to:

- Health and well-being is not just about the amount of living space but access to outdoor areas / a garden, public parks and green space, quality of not only existing but new housing stock, affordability and sufficient maintenance where housing is social housing or sold for private renting. More information is needed which demonstrates the current levels of space, quality and affordability of homes in the borough, to form a complete judgement.

### Stafford Borough Council Response

Stafford Borough Council notes the comments made.

### 8.F) Do you consider that the housing mix detailed in the table (below) will be sufficient in meeting the needs of all members of the community?

Number of bedrooms	1 bed	2 bed	3 bed	4+ bed
Estimated Future Need / Demand	17%	31%	42%	11%
Recommended Range	10-30%	25-40%	35-50%	5-20%

(The above table has been taken from the Issues and Options Consultation Document)

Response	Count
Agree / Yes	19
Disagree / No	14
Other Comments	3
No View Expressed	146
<b>Total</b>	<b>181</b>

**Responses were received from the following respondents:** 17, 22, 26, 29, 49, 53, 54, 56, 57, 64, 66, 67, 68, 69, 70, 71, 74, 75, 80, 81, 87, 89, 94, 97, 98, 99, 100, 101, 102, 103, 106, 109, 110, 119, 162, 174

### Summary of Responses

The range of views expressed in respect of this question was quite varied and did not form a consensus. Whilst the broad mix was, overall, deemed appropriate (albeit some respondents wanted more detail as to how the proposed mix was derived) there was some variation of opinion in the approach that might be taken.

- There was some discussion about the need to meet the borough's housing need (in terms of mix) and the character of the borough which would be affected by, for example, favouring the provision of either 4+ bed dwellings or smaller dwellings (1-2 bed roomed properties) and whether there should be a

spatial aspect to this, e.g. more larger dwellings in the smaller and rural settlements.

- In addition, there was some advocacy for the approach to be centred on a set of policies that focus on specific needs that should be addressed, e.g. the proportion of affordable housing, older persons housing, housing for people with disabilities, first time buyers housing, family housing, students, those who might wish to build their own dwelling, etc. To achieve this, it was suggested that regular housing assessments should be conducted throughout the plan period to determine market signals to inform provision and make up of housing mix along with variations in these across the borough.
- The need for some variation in the type of smaller homes was described by a number of respondents:
  - Affordable homes for let.
  - In the town centre and near other centres for younger people.
  - To allow more mature residents to downsize to a more manageable property close to local facilities, with a need for bungalows as well as flats being expressed.
  - In rural areas.
- One respondent suggested that any policy in this respect should not be prescriptive but should advocate a housing mix based on broad ranges expressed as targets across the borough as a whole, with the actual mix of individual sites being negotiated on a site-by-site basis. Several respondents were in favour of this being decided on a site-by-site basis.
- One respondent suggested that it is most appropriate for the housing mix to be guided by market signals, as defined within the most up-to-date assessment of needs, with this assessment being routinely updated across the 20-year Plan period.

From those disagreeing with the proposed mix, their comments included:

- That greater emphasis should be placed on the provision of affordable housing in the form of 2 bed starter homes and the mix for this type should be increased to 50%.
- That the housing need derived from the EHDNA is excessively skewed towards older age groups but that greater demand will be experienced for family housing.
- That housing for older people is best provided through specialised standalone housing developments of apartments or bungalows, normally of one or two bedrooms with some care or support services. This means that such housing is built in clusters and not spread over the development.

### **Stafford Borough Council Response**

Stafford Borough Council notes the views expressed and will present its proposed approach in the Preferred Option document.

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

A total of 24 respondents made representations in respect of this issue.

**Responses were received from the following respondents:** 3, 17, 22, 26, 53, 54, 67, 68, 69, 70, 71, 74, 75, 77, 87, 92, 93, 100, 101, 102, 103, 156, 162, 174

**Summary of Responses**

The responses to this question demonstrated strong support for the hypothesis that the lack of smaller housing was an issue within the borough.

- Particularly identified as problematic were:
  - Smaller dwellings and bungalows in the rural areas.
  - Smaller homes are required in the town centre and near other centres.
- One respondent suggested that, specifically in respect of small bungalows in rural areas, there should be a presumption in favour of development for both the sale and rental sectors.
- One respondent recognised the need for the provision of new smaller accommodation but was concerned that such properties should be well designed, have sufficient storage space, have access to adequate outdoor space, parking, including for visitors, to make downsizing an attractive proposition.
- Developers made a number of specific comments in response to this question, with them all offering a similar response. To summarise their views, they considered that the housing stock in Stafford, Stone, Gnosall and Weston to be balanced but they recognised the current demand for smaller 2 and 3 bedroomed properties across the borough.

**Stafford Borough Council Response**

Stafford Borough Council notes the views expressed and will present its proposed approach in the Preferred Option document.

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

<b>Response</b>	<b>Count</b>
Agree / Yes	23
Disagree / No	12
No View Expressed	146
<b>Total</b>	<b>181</b>

**Responses were received from the following respondents:** 3, 19, 22, 24, 26, 27, 46, 53, 54, 56, 57, 58, 59, 67, 68, 69, 70, 71, 75, 80, 81, 87, 89, 90, 92, 93, 94, 100, 102, 103, 106, 110, 112, 162, 174

## Summary of Responses

There appeared to be reasonably strong support for this proposal with the following comments made:

- A request that the definition of “major development” is kept reasonable. In the respondent’s view this would be developments of over 20 houses.
- A number of respondents queried why the policy should be restricted to affordable homes rather than 20% of all new houses on major developments
- Several respondents felt that the requirement needs to be robustly evidenced, justified that it is necessary (e.g. from registered providers) and viable for housing associations and developers to do so.
- Additionally, it was requested that some policy flexibility should be afforded to allow for developments where this is not required, and a site-by-site approach should be taken, which takes into consideration the location of the scheme and its intended occupants, in addition to other potential factors.
- It was noted by one respondent that the incorporation of the Category 2 Access Standards added additional costs of £520-£940 per dwelling, excluding costs of additional land associated with the requirements of the standards.
- Some respondents felt that such provision should be implemented via a standardised approach through the Building Regulations and questioned what the rationale is for standards to be any different in Stafford Borough as opposed to the national approach.

## Stafford Borough Council Response

Stafford Borough Council notes the views expressed and will present its proposed approach in the Preferred Option document.

**8.1a) Should the Council consider a policy requiring bungalows to be delivered on all major developments? If so, should there be a minimum number or proportion of such bungalows for each development?**

Response	Count
Agree / Yes	15
Disagree / No	23
Other / Neutral comment	8
No View Expressed	135
<b>Total</b>	<b>181</b>

**Responses were received from the following respondents:** 3, 11, 10, 14, 17, 19, 22, 24, 26, 29, 46, 53, 54, 56, 57, 58, 59, 66, 67, 68, 69, 70, 71, 74, 75, 80, 81, 87, 92, 93, 94, 100, 101, 102, 103, 104, 106, 109, 110, 111, 112, 119, 120, 162, 166, 174

## Summary of Responses

In numerical terms there was a relatively even split between those supporting a requirement for the provision of bungalows and those opposing with, typically, residents and parish councils supporting and others opposing.

Those supporting the proposition suggested:

- 5% of developments of over 20 houses should be bungalows.
- 20% of dwellings should be bungalows.
- Bungalows should be delivered on all sites of more than ten units.
- That ground level living accommodation should be available as an option to those who want / need this, be it a bungalow or ground floor flats.
- That in certain circumstances (e.g. skyline, landscape) the provision of bungalows can provide a suitable development option.

Whilst others supporting the requirement for the provision of bungalows observed:

- Very few new bungalows have been built on major developments in recent years.
- That because of their relatively high land take and build cost they are unprofitable for developers.
- There is a high market demand for bungalows, both in the towns and more rural areas, as evidenced by their saleability and market premium.
- That a blanket requirement would not be appropriate and that any requirements should be determined on the basis of evidence on a settlement-by-settlement basis, taking into account local need identified in any relevant Housing Need Assessment and informed by a robust and up-to-date viability study.
- The need to deliver specialist housing, including bungalows, should be guided by demand and market signals, through an up-to-date evidence base. It would be inappropriate to impose a borough-wide percentage provision for bungalows, as the demand for which varies geographically.

Some of those opposing the proposition for a requirement for the provision of bungalows in developments expressed some sympathy for the concept. However, these and others opposing this approach cited:

- Such a requirement is unduly restrictive and onerous.
- A lack of geographically specific evidence to justify such an approach.
- Demand for specialist housing should not be considered exclusively through the provision of bungalows. Other types of accommodation are suitable for the provision of specialist accommodation, including Extra Care Housing, sheltered accommodation and adaptation of existing housing stock.
- Specifying Lifetime Homes rather than bungalows may be a better option.

- That other types of development can better provide social and community support for older people.
- The location and accessibility of any specialist housing should be a consideration for all schemes whatever its type to ensure that people have access to services and to public transport in order to avoid social isolation and promote independence and community interaction.
- Any policy for bungalows must be part of a wider policy that possibly allocates but certainly encourages the provision of all forms of bespoke older persons housing in brownfield and greenfield locations.
- That bungalows are an inefficient use of land. Councils should be aiming for a higher density than this approach would permit.
- That the requirement for such a provision would impact on the viability of schemes and developers' ability to provide affordable housing.
- That where development is meeting a specific need, the council should apply policy flexibility to support such provision, e.g., by relaxing policy requirements with regards to the mix of dwelling types and sizes, as well as the provision of on-site open space.
- An assertion that the provision of bungalows is contrary to the NPPF due to their lack of land efficiency.

### **Stafford Borough Council Response**

Stafford Borough Council notes the views expressed and will present its proposed approach in the Preferred Option.

### **8.1b) Should the amount of land required for such bungalows be reduced by either limiting their garden size or encouraging communal/shared gardens?**

<b>Response</b>	<b>Count</b>
Agree/Yes	13
Disagree/No	7
No View Expressed	161
<b>Total</b>	<b>181</b>

**Responses were received from the following respondents:** 3, 14, 22, 26, 53, 54, 66, 74, 75, 92, 94, 100, 101, 102, 103, 112, 119, 120, 166, 174

### **Summary of Responses**

Of those responding to this question there was some, but not universal, acceptance that the land take of bungalows should be limited within policy to allow for reduced maintenance for elderly residents. Within this a number of specific comments were made:

- A general preference for the provision of private gardens and amenity space rather than shared amenities due to perceived poor and costly maintenance of these shared areas.

- Some concern that the provision of excessively small gardens would be detrimental and would lead to a “ghettoisation” of such development.
- One respondent suggested that a range of garden share and park share options should be considered along with support for spaces to store caravans / motorhomes.
- One respondent suggested that a variety of bungalow plots should be available for those who like to keep healthy and active and will use the gardens, and others for those who have a more sedentary life.
- Several respondents suggested it would seem logical to reduce garden sizes or allow for the provision of communal/shared gardens to ensure efficient use of land. This approach is also likely to align to any appropriate space about dwellings requirements, which should reduce the necessary distance between principal facing windows for ground floor windows, where intervening boundary treatments would interrupt views.

### **Stafford Borough Council Response**

Stafford Borough Council notes the views expressed and will present its proposed approach in the Preferred Option.

### **8.1c) Is there a need for bungalows to be delivered in both urban and rural areas?**

There were a total of 10 responses to this question, all of which were in support.

**Responses were received from the following respondents:** 3, 22, 26, 54, 92, 100, 112, 119, 120, 166

### **Summary of Responses**

The limited response to this question was supportive of the need to deliver bungalows in both urban and rural contexts although the comments made were more applicable to a rural context.

- That people will wish to provide a retirement home on land already owned for themselves or a relative in their own community.
- To enable downsizing or a move to a dwelling more appropriate to their current and future personal needs whilst remaining in their own community.
- An observation that the rural population has an older profile than urban areas.

### **Stafford Borough Council Response**

Stafford Borough Council notes the views expressed and will present its proposed approach in the Preferred Option.



### **8.Id) Are there any other measures the Council should employ to meet the demand for specialist housing within the borough of Stafford?**

There were a total of 9 responses to this question.

**Responses were received from the following respondents:** 3, 22, 24, 26, 49, 54, 100, 119, 174

#### **Summary of Responses**

A range of suggestions were made in respect of this question which included:

- Should the council insist on sufficiently flexible and accessible living space, e.g. doors wide enough for wheelchairs, in the mainstream provision of new housing then the requirement for specialist housing would be reduced.
- The use of restrictive requirements for infill development in villages, for example dwelling must include a disabled / accessible bathroom on the ground floor; or, that the dwelling should be built / lived in by someone with a demonstrable connection to the village.
- That the council's evidence base should give a full view of the need and appropriate locations for Extra Care Housing and also Care Homes. It was commented that the "Staffordshire Extra Care and Sheltered Housing report" (2018) was not sound due to the methodology employed and lack of best practice. As such, it was suggested that a new assessment should be produced to identify the need for different types of specialist elderly accommodation. Further, the stated requirement in the EHDNA of 120 units of extra care and sheltered accommodation, is unreasonably low.
- That the council should consider the specific allocation of land for the explicit purpose of housing for the elderly, e.g. retirement living complexes, elderly or care home facilities.
- That in making such allocations the council should consider the opportunities offered by a retirement village which were stated to provide a larger quantity of various types of retirement living accommodation incorporating flats, bungalows and for those requiring greater levels of care and the integration of appropriate services.
- A request that the Plan should provide clarity about when and where care home developments, due to their specific characteristics, would be supported by the council so that specialist developers could avoid a situation where care home uses were competing with residential developers to secure sites.
- That the council should consider C2 (sheltered housing) accommodation as a priority rather than bungalows.
- That no housing unit intended for elderly people should have only one bedroom owing to the potential need for family or support workers to stay to provide support.

- That the curtilage of such dwellings should include sufficient storage space and a dedicated parking area to avoid obstructions and allow charging of electric cars.

### **Stafford Borough Council Response**

Stafford Borough Council notes the views expressed and will present its proposed approach in the Preferred Option.

### **8.J) Do you consider that there is no need for additional provision of student accommodation within the borough?**

There were a total of 7 responses to this question, who were all in support.

**Responses were received from the following respondents:** 3, 17, 22, 26, 54, 92, 162

No additional comments were received for this question.

### **Stafford Borough Council Response**

The council notes the support received in respect of this question.

### **8.Ka) Do you consider an affordable housing provision of between 252 and 389 units per annum to be achievable?**

<b>Response</b>	<b>Count</b>
Agree / Yes	17
Disagree / No	13
Other Comments	7
No View Expressed	144
<b>Total</b>	<b>181</b>

**Responses were received from the following respondents:** 3, 17, 22, 24, 26, 27, 33, 53, 54, 56, 58, 59, 61, 64, 67, 68, 69, 70, 71, 74, 75, 77, 80, 81, 86, 93, 94, 98, 100, 101, 102, 103, 106, 108, 110, 162, 174

### **Summary of Responses**

There was a marked split of views expressed on this matter, with a range of respondents suggesting that the provision of between 252 and 389 affordable housing units per annum is achievable whilst a slightly smaller number considered such a level of provision to be unachievable within the range of total housing requirements discussed within the consultation document.

It is useful to highlight some overarching comments specifically made by housing providers:

- That due to changes in financial regulations, providers (e.g. Stafford and Rural Homes) are now allowed to invest and reinvest in more homes thereby

increasing the potential numbers of affordable dwellings that might come forward.

- Housing Associations (via WMHAPC) are keen to boost the supply of affordable housing within the borough and would support an ambitious housing requirement which would facilitate the delivery of more affordable homes. WMHAPC are mindful that the target needs to be ambitious but achievable and for that reason would support 252 units per annum being set as a minimum target which is expected to be exceeded rather than a cap to development.
- The housing providers are open to work with the council to significantly increase provision of affordable housing.
- The housing providers are open to the development of a local definition of affordable housing, as per the West Midlands Combined Authority, that will encourage delivery of a diverse range of affordable housing types that will meet local needs.
- As the presumption should always be in favour of on-site affordable housing delivery, a request for early engagement by developers with local Housing Associations should be emphasised in the Plan.
- Owing to the rural nature of the borough, a request for a proactive approach to allocating rural exception sites.
- Encouragement for the council to introduce a locally specific policy on entry-level exception sites that enables the delivery of affordable housing-led schemes that are aimed at first-time buyers and renters, and also seek to allocate land specifically for these sites to encourage further delivery in addition to rural exception sites

Additional comments provided by other respondents:

- A variety of respondents considered that the provision of between 252 and 389 affordable housing units per annum is achievable and also expressed concern that in light of Covid, with the potentially severe social and financial challenges that may result, the need for affordable housing is likely to increase.
- One respondent suggested that the council should aim for an affordable housing provision of at least 50% of total provision.
- Conversely a number of respondents considered that, in order to provide between 252 and 389 affordable units per annum, an overall housing requirement of 408 units would provide an unrealistic basis since this would require affordable units to account for a very considerable proportion of the annual provision. However, it was viewed possible by these respondents to achieve this level of affordable housing provision, if a sufficiently large housing requirement is set along with the allocation of land for large housing sites, urban extensions and garden communities.

- Similarly, a number of developers considered that a target of 252 affordable homes per annum is only likely to be achievable if a housing requirement in line with Scenario F, as a minimum, is pursued. This would require a continuation of an affordable housing requirement of between 30% and 40% on qualifying sites and this would need to be balanced with other policy requests through an assessment of viability.
- A further point made by some considering this level of affordable housing provision, was that past performance in the borough would suggest that this level of provision is unrealistic.
- It was asserted that, combined, these factors make the provision of affordable housing unviable in such developments.

Other comments made included:

- That in recent years the affordability ratio for the borough has increased, implying housing is now less affordable in Stafford Borough than a few years ago.
- Reference to the recent report of the Affordable Housing Commission (March 2020) which identified a national cohort of some 1.6 million 'Frustrated First-Time Buyers', of which some 0.3 million reside in social rented housing. At the local level, the EHDNA 2020 identifies a wide income gap for such households (paragraph 13.30 and figure 13.5) in Stafford borough. Those households with incomes between £21,103 and £34,903 risk being 'trapped' in the private rented sector or needlessly occupying social rented housing, unable to afford to purchase a home at the lower quartile of the housing market. This assumes that such households are able to raise a 16% deposit, which in Staffordshire would stand at £24,000; this would take many years for those households not fortunate to access inherited wealth or the 'Bank of Mum and Dad'.
- That the provision of a diverse range of market housing will not compensate for an under-delivery of genuine affordable housing. This was also linked to recently completed work by the West Midlands Combined Authority in preparing a locally agreed definition of what affordable housing means in the West Midlands context.
- The suggestion by Iceni (on behalf of one developer) that the EHDNA underestimates the affordable housing requirement by 62 homes per year by undercounting those requiring support to achieve their own home
- Sufficient transport infrastructure would need to be provided to support any residents of these dwellings.
- Some questioned whether affordable housing was required in all areas of the borough.
- A suggestion that developers do not want to provide affordable housing on their developments, but the council should actively demand such provision.

- That a continuing under-provision of affordable housing will continue to cause pressure on other council services and will also impact on the economy of the borough through the lack of ability to attract labour.
- The promotion of the model provided by Rentplus.
- Those promoting specific schemes / sites.

### **Stafford Borough Council Response**

Stafford Borough Council notes the views expressed and will present its proposed approach in the Preferred Option.

### **8.Kb) When a lower provision of affordable housing is sought, would the supplementary supply of a diverse range of market housing in accordance with the findings of the EHDNA be sufficient?**

There were a total of 9 responses to this question, with 6 in support and 3 against.

**Responses were received from the following respondents:** 3, 17, 24, 26, 27, 49, 54, 64, 174

### **Summary of responses**

An extended response to this question was only provided by one respondent. The main points were:

- The proposed seems reasonable and could ensure developments that might otherwise be unviable are provided in Stafford Borough.
- The policy should however build in some flexibility on the mix and tenure of affordable housing provision on a particular site. For example, there should be an acknowledgement that provision of affordable units within an apartment building, for example, causes problems and additional costs for registered social providers which then limits the nature / tenure of any affordable housing provided on site.
- The respondent, who is a commercial provider of extra-care housing for older people, also requested that the council should clarify in any new policy whether the provision of affordable housing applies specifically to Use Class C3 residential. They further suggested that other Use Classes, such as C2 Extra Care proposals should not be required to provide affordable housing on the following basis:
  - The upfront set up costs, and the ongoing running costs of a C2 Extra Care development are significantly higher than that of C3 market housing; and
  - The floor space devoted to the communal facilities necessary for such development significantly affect saleable space.

### Stafford Borough Council Response

Stafford Borough Council notes the comments made in respect of this issue.

#### 8.L) Should the council require affordable units to be delivered on sites with a capacity of less than 5 units in designated rural areas?

Response	Count
Agree / Yes	10
Disagree / No	12
No View Expressed	159
<b>Total</b>	<b>181</b>

Responses were received from the following respondents: 3, 17, 19, 22, 24, 25, 26, 27, 54, 59, 67, 68, 69, 70, 71, 92, 93, 100, 112, 127, 162, 174

#### Summary of Responses

Only two comments were made in respect of this matter, both supportive.

- One respondent suggested that these rural affordable houses should be in addition to the borough's affordable housing requirement with sufficient public transport links provided by the county council and for these houses not to be transferred from requirements of other sites where house prices are higher.
- The point was also made that any such provision should not be at the expense of Green Belt land.

### Stafford Borough Council Response

Stafford Borough Council notes the views expressed and will present its proposed approach in the Preferred Option.

#### 8.M) To help maintain the supply of land for rural affordable housing should the Council, where development hasn't started, convert existing Rural Exceptions to Rural Affordable Housing Allocations?

Response	Count
Agree / Yes	16
Disagree / No	9
No View Expressed	156
<b>Total</b>	<b>181</b>

Responses were received from the following respondents: 3, 17, 22, 24, 25, 26, 27, 53, 54, 59, 67, 68, 69, 70, 71, 73, 74, 75, 100, 101, 102, 103, 162, 166, 174

#### Summary of Responses

Although relatively few in number the following comments made in respect of this question raised some interesting issues. The comments were generally supportive of

the intention of the proposal but were more cautious in how the amount of rural affordable housing might be increased. Comments included that:

- Current Rural Exception Sites should be reviewed with a housing need survey to ensure that the provision is still needed in the current locations, and that there are not now different areas of need since the previous plan.
- The Rural Exception sites should be maintained but that Stafford should move to take a less traditional approach to Rural Exception Sites by including in their local plans a presumption in favour of genuinely community-led schemes. In East Cambridgeshire District Council's Local Plan this presumption in favour even extends to land not identified for development and includes land outside of development envelopes, i.e. Rural Exception Sites.
- The recognition that some settlements, Hopton was quoted by the respondent, have an ageing population and need for some development in order to encourage "new blood" into the settlement.
- The desire expressed by one respondent that any such properties coming forward should be held in perpetuity through a S106 agreement to ensure future availability of the affordable housing generated to future generations.
- Reference to the commitment of the NPPF (2018) to significantly boost the supply of homes through ensuring 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.
- One respondent highlighted the issue of Agricultural Workers Dwellings which were not considered by the Issues and Options document. The respondent further suggested that the revised NPPF outlines an exemption allowing a new dwelling for new entrants taking on a farm and measures to accommodate additional worker homes on farms. It was therefore viewed as critical by the respondent that the council addresses this omission and sets out a policy to take into consideration the housing needs of people employed in agriculture and rural businesses, particularly when those businesses are located within the green belt.

### **Stafford Borough Council Response**

Stafford Borough Council notes the views expressed and will present its proposed approach in the Preferred Option.

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

<b>Response</b>	<b>Count</b>
Agree / Yes	12
Disagree / No	28
Other Comments	1
No View Expressed	140
<b>Total</b>	<b>181</b>

**Responses were received from the following respondents:** 3, 10, 11, 14, 17, 19, 22, 26, 27, 39, 53, 54, 57, 58, 67, 68, 69, 70, 71, 72, 74, 75, 81, 87, 89, 92, 93, 94, 100, 101, 102, 103, 104, 106, 110, 111, 112, 119, 127, 162, 174

### **Summary of Responses**

Whilst there was some support for this proposal the general view was that if the council insisted on new developments with a site capacity of over 100 dwellings to provide 5% of those plots as serviced plots available for self-build homes, this would not be a positive way forward. This view was shared by most respondents providing written comments, irrespective of background / interest.

The comments supporting this proposition thought that:

- It would help ensure a reliable supply of serviced self-build plots, although the respondent did then proceed to discuss this initiative in the context of small villages where, arguably, sites of over 100 dwellings are less likely to come forward.
- That such an approach would be consistent with the Hixon Neighbourhood Plan.

Those arguing against this proposal cite a number of reasons why such an approach is inappropriate:

- Self-builders are individualists and would probably prefer not to be on large estates of similar housing. Therefore, it may be better to set aside a few sites for self-build and reserve the right to ask a developer to make up to 5% of sites available if there is demand.
- The relatively small number of people on the self-build register would not justify such an approach.
- Such an approach would slow down the completion of the development.
- Practical issues including the day-to-day operation of such sites and consideration of potential health and safety issues of having multiple individual construction sites within one development. This therefore represents an onerous requirement.
- Inconsistent design merit between the different developers



## Stafford Borough Council Response

Stafford Borough Council notes the views expressed and will present its proposed approach in the Preferred Option.

### 8.Nb) Should the council allocate plots for the purpose of self-build throughout the borough?

Response	Count
Agree / Yes	33
Disagree / No	3
No View Expressed	145
<b>Total</b>	<b>181</b>

**Responses were received from the following respondents:** 3, 10, 11, 14, 17, 19, 22, 24, 26, 27, 39, 53, 54, 57, 58, 67, 68, 69, 70, 71, 72, 74, 75, 89, 92, 93, 100, 101, 102, 103, 106, 112, 119, 127, 162, 174

### Summary of Responses

The suggestion that the council allocate plots for the purpose of Custom and Self Build (CSB) throughout the borough was warmly greeted by a large proportion of those responding to this question with a range of comments and suggestions being made. These included:

- Specific CSB sites should be allocated through the borough on small scale developments so that the architectural merit is evenly spread.
- Avoids an arbitrary requirement on larger sites, which is onerous for landowners, developers and does not serve the specific needs of self-builders.
- Allocation for CSB gives a site the strongest possible chance of actually being built out for custom and / or self-build. By allocating small-scale CSB sites of up to 20 plots, Local Planning Authorities (LPAs) can deliver the sorts of CSB opportunities that prospective self-builders want to build on. It is known that prospective custom and self-builders do not normally want to build their own home on a large estate.
- The mechanism gives LPAs control over where CSB should be built, enabling extra control over the design process, which can be further augmented by the use of “plot passports”.
- In addition to allocating sites specifically for custom and self-build, the LPA should consider a rural exception sites policy in which small-scale sites, which are outside settlement boundaries but sustainable and well-related to the settlement, can be considered appropriate for self-build.
- Self-build allows much more ‘Character’ to an area and should be encouraged as it could be an alternative way for people to get onto the property ladder

- Self-build units will add some diversity to the accommodation and design of dwellings in the community.

### **Stafford Borough Council Response**

Stafford Borough Council notes the views expressed and will present its proposed approach in the Preferred Option.

### **8.Oa) Do you consider that the approach detailed above will be beneficial to the smaller settlements of the Borough of Stafford and their residents?**

<b>Response</b>	<b>Count</b>
Agree/Yes	21
Disagree/No	1
No View Expressed	159
<b>Total</b>	<b>181</b>

**Responses were received from the following respondents:** 3, 17, 19, 22, 24, 26, 53, 54, 67, 68, 69, 70, 71, 72, 87, 92, 93, 100, 119, 127, 162, 174

### **Summary of Responses**

There was a wide consensus that the approach outlined for the enablement of Custom and Self Build (CSB) in the smaller settlements was a positive approach. However, a cautionary point was made in that there was some disagreement that the provision of CSB exclusively would be able to meet this demand in that not all residents that are willing or able to engage in self-build housing. As such an exclusively CSB approach would place an undue requirement on residents who are looking to stay within communities should they need to undertake a self-build project to stay in their communities and ensure that there is not stagnation. As such it was suggested that the provision of small-scale commercial housing developments to meet local needs should also be supported.

Further points made included:

- That it is of paramount importance that rural communities are revived with small scale sympathetic developments to aid in shifting the age demographic.
- One respondent was in support, so long as planning permission can be gained by Landowners for open market sale to prospective self-builders. In addition, pre-start conditions could assist implementation of these rules and charges against title could be taken to ensure compliance for a defined period post construction.
- A suggestion that a maximum of five dwellings should definitely not be exceeded for the whole of the existing settlement, and that those five should not be permitted on a single area of land. It was proposed that in order to avoid rural areas taking on an urban character this could be guaranteed by stipulating:

- The maximum area allowed for development.
- The maximum number of residential units within that area.
- The maximum number of potential occupiers within each unit.
- Fixed densities which would prevent housing estates and closely clustered homes being built.
- All designs should be in character with the neighbouring properties and hamlet.
- The proponent further suggested that such self-builds should have the full support of neighbours, residents, and parish council.

### **Stafford Borough Council Response**

Stafford Borough Council notes the views expressed and will present its proposed approach in the Preferred Option.

### **8.Ob) Do you think it would be beneficial to only allow people the ability to build their own homes in smaller settlements if they have a demonstrable connection to the locality of development site?**

<b>Response</b>	<b>Count</b>
Agree / Yes	15
Disagree / No	4
Other Comments	1
No View Expressed	161
<b>Total</b>	<b>181</b>

**Responses were received from the following respondents:** 3, 17, 19, 22, 24, 26, 54, 58, 67, 68, 69, 70, 71, 92, 93, 100, 119, 127, 162, 172

### **Summary of Responses**

In respect of the proposal to limit such CSB opportunities to those with a demonstrable connection to the settlement there were two broad views expressed:

- Self-build should only be permitted if by and for residents, or residents' parents / grandparents, needing accommodation more appropriate for their retirement, i.e. down-sizing, one-storey e.g. bungalow etc., and therefore will not be put on the open market once completed.
- Or that there is an argument for organic and natural growth to say no to this restriction.

### **Stafford Borough Council Response**

Stafford Borough Council notes the views expressed and will present its proposed approach in the Preferred Option.

## Section 9 – Delivering Quality Development

### 9.A) Should the Council:

#### 9.Aa) Have a separate policy that addresses Green and Blue Infrastructure?

Response	Count
Agree / Yes	22
Disagree / No	3
No View Expressed	156
<b>Total</b>	<b>181</b>

#### 9.Ab) Identify specific opportunities for development opportunities to provide additional green infrastructure to help provide the “missing links” in the network?

Response	Count
Agree / Yes	21
Disagree / No	2
No View Expressed	158
<b>Total</b>	<b>181</b>

The responses for 9.Aa and 9.Ab have been considered together. Please note not everyone answered both parts of this question.

**Responses were received from the following respondents:** 3, 12, 15, 17, 22, 24, 25, 27, 29, 37, 38, 39, 41, 54, 58, 74, 75, 87, 92, 101, 102, 103, 106, 119, 162, 166, 168, 181

### Summary of Responses

The majority of responses to 9A were a Yes / No answer, with some extended comments made. The comments that were made related to:

- The importance of Sustainable Drainage Systems (SuDS) and their relationship to Green Infrastructure was noted by a number of respondents. It was stressed that SuDS needs to be considered as part of full planning and not at a later date as this causes little flexibility for change or adaptations.
- One respondent supported the inclusion of wetland and water as there are a significant number of areas where these are a major part of the borough’s green assets.
- In addition, there needs to be an increased number of clear targets and monitoring of this area so that this is something the borough can be held to account on and ensure it is effectively delivering.
- Natural England advised that the Green Infrastructure policy should support other policies e.g. biodiversity, green space, flood risk and climate change adaptation.

- Staffordshire Wildlife Trust raised the point that to identify specific opportunities, the Nature Recovery Network mapping could be used, which highlights a number of opportunity sites and gives a basis for identifying more.
- One respondent felt that it is important that current areas that are considered green or blue infrastructure are assessed to determine if the site could be better used by an alternative use such as residential, with the local plan providing an opportunity to review the sites.
- One respondent stated enhanced Green Infrastructure should include carbon sequestration, meaning new areas are created to achieve biodiversity gains for the plan as a whole.
- Another respondent felt that there isn't the need for another policy which risks a more fragmented approach as the natural environment and green infrastructure should be considered holistically.
- In addition, several respondents felt that green and blue infrastructure should be determined on a site-by-site basis, with details, such as type, location and amount, being considered at the planning application stage, rather than the policy being too prescriptive as sites and their contexts will vary.

### **Stafford Borough Council Response**

Stafford Borough Council notes the views expressed and will present its proposed approach in the Preferred Option.

### **9.B) How should Plan Policies be developed to identify opportunities for the creation of new habitat areas in association with planned development, as part of the wider nature recovery network?**

A total of 23 respondents made representations in respect of this issue.

**Responses were received from the following respondents:** 3, 6, 17, 22, 24, 25, 27, 29, 37, 38, 39, 54, 74, 75, 80, 86, 92, 101, 102, 103, 119, 162, 181

### **Summary of Responses**

All the responses supported the need for green infrastructure and the creation of new habitats. Respondents felt that the approach outlined was a positive approach. Responses stated that:

- Development plans play a key role in protecting and enhancing designated sites, habitats and species as part of efforts to reverse the long-term decline in nature globally and at home.
- The need for the plan to identify the gaps within the habitat network and to promote and develop connectivity between them.
- Emphasis on the need to utilise the Nature Recovery Network document for identifying sites to deliver projects and address gaps within provision.

- Staffordshire County Council encouraged a more holistic approach to Climate Change impacts by creating a new Green and Blue Infrastructure Plan at the heart of the local plan. All the other threads and sections of the plan with their policies should relate to the GBI plan, as without a healthy and resilient environment the other aspects of the plan will not be achievable.
- The need for clear targets and monitoring. Gnosall Parish Council felt that existing laws were sufficient but that they weren't enforced.
- The need for the strategic map of the borough to include canal corridors, river corridors and key elements of the Natural Assets Plan.
- Multiple respondents stated that the plan should contain policies that are specific about the types of actions required to establish and strengthen ecological networks.
- Respondents raised the issue that all policies within the plan should have a 'green' emphasis.
- The restoration and creation of new areas of habitat in association with development must be proportionate and have regard for food production. The respondent was concerned that moves to create large areas of habitat with bigger mitigation areas will result in higher food imports from other areas of the world that do not produce food to the same environmental and animal welfare standards as UK farmers.

### **Stafford Borough Council Response**

The local plan and its constituent policies have been prepared in light of Stafford Borough Council's Biodiversity Strategy, the Nature Recovery Network, Stafford Borough Council's Climate Change and Green Recovery Strategy 2020-2040 and the Staffordshire County Council Climate Change Adaptation and Mitigation study.

The council is keen to ensure that as high as possible green infrastructure standards and new habitat creation is achieved, but similarly recognises the necessary evidence requirements to justify such an approach. The proposed approach to these matters will be detailed in the Preferred Option.

### **9.Ca) Should the new Local Plan continue to protect all designated sites from development, including maintaining a buffer zone where appropriate?**

<b>Response</b>	<b>Count</b>
Agree / Yes	22
Disagree / No	5
Other Comments	6
No View Expressed	148
<b>Total</b>	<b>181</b>

**Responses were received from the following respondents:** 3, 6, 10, 14, 17, 19, 22, 24, 27, 37, 38, 39, 41, 54, 57, 58, 61, 74, 75, 80, 81, 87, 92, 101, 102, 103, 106, 119, 162, 166, 168, 175, 181

## Summary of Responses

The majority of responses were in support of the continued protection of all designated sites from development and the inclusion of a buffer zone. Comments included the following:

- One respondent felt that there should also be high priority to reducing impacts on designated sites by reducing impacts from surrounding areas such as upstream sites in river catchments.
- Staffordshire Wildlife Trust suggested that the size and type of buffer zone required will vary significantly depending on the habitat type and sensitivity. For example, sites where nesting birds need to be protected from disturbance would require a different buffer zone to an area where public use can be encouraged. Wetlands and peatlands require the largest buffers, as they are dependent on sympathetic drainage and management of surrounding land and natural unpolluted water catchments. The Trust would also encourage the setting of standard minimum buffers for particular sites and habitats, and assessment to determine impacts and requirements for particularly vulnerable sites.
- The Woodland Trust supports explicit protection of ancient woodland as a designated habitat. They recommended the inclusion of a specific policy in the local plan to protect ancient woodland and veteran trees, in line with the NPPF (paragraph 175c).
- The implementation of a buffer zone will depend on the quality and contribution of that zone considered against the benefits of that location for development.

Some comments were received against this question and are summarised as follows:

- One respondent considered that it would not be appropriate for the Plan to define 'buffer zones' around sites for green / biodiversity enhancement unless there is evidence of the need for such a measure, i.e. the avoid, mitigate, compensate approach is demonstrably incapable of rendering development in the vicinity of the site.
- One respondent raised the point that it is important to recognise the potential opportunities that development can bring to enhance these assets further, for example any development within 8km of Cannock Chase SAC which proposed significant open space that new residents could use in lieu of travelling to Cannock Chase should be supported by the council as it should reduce recreational impact on the SAC.
- One respondent felt there is no basis in national policy or guidance for local plans to introduce buffer zones around designated sites.
- One respondent felt that not all sites with current designations meet the criteria of their designation and should be reassessed. This respondent then

used this point to bring attention to their proposed site/land which they felt should be reassessed.

### **Stafford Borough Council Response**

Stafford Borough Council will explore if buffer zones should be applied and if so, how and where they are applied. The council will consider this matter further and its proposed approach will be reflected in the Preferred Option.

### **9.Cb) Encourage the biodiversity enhancement of sites through development, for example, allocating sites which can deliver biodiversity enhancement?**

<b>Response</b>	<b>Count</b>
Agree / Yes	16
Disagree / No	5
No View Expressed	160
<b>Total</b>	<b>181</b>

**Responses were received from the following respondents:** 6, 14, 17, 24, 29, 37, 38, 39, 54, 57, 58, 61, 80, 81, 87, 92, 119, 162, 166, 168, 181

### **Summary of Responses**

Responses to this question can be summarised as follows:

- The Stafford Borough Council Nature Recovery Network Report should be utilised, if damage to irreplaceable habitats can be avoided and a net gain for nature and other environmental standards can be achieved.
- The approach has potential, although the benefits must be clear and quantifiable, and the site appropriate in the first instance for development.
- A policy that encourages biodiversity enhancements must make clear that off-site or on-site enhancements are acceptable in planning terms.
- Argument for a preferential approach to allocating sites for development that can deliver biodiversity enhancement, provided that there are strong mechanisms in place for ensuring that such enhancement is well-designed, is actually executed and is properly managed and maintained thereafter.
- So long as biologically important sites are not sought after for development to enable this, thus resulting in sacrificial damage.

### **Stafford Borough Council Response**

Stafford Borough Council notes the comments made and will present its proposed approach to this matter in the Preferred Option.

It is worth noting that the Environment Act 2021 has introduced a 10% mandatory Biodiversity Net Gain for all developments which gain planning permission after November 2023, with very few exceptions. This may result in the council allocating



sites which are deemed as suitable to deliver off-site biodiversity net gain where required.

**9.Cc) Require, through policy, increased long term monitoring of biodiversity mitigation and enhancement measures on development sites?**

<b>Response</b>	<b>Count</b>
Agree / Yes	16
Disagree / No	6
No View Expressed	159
<b>Total</b>	<b>181</b>

**Responses were received from the following respondents:** 3, 6, 14, 24, 27, 37, 38, 39, 54, 57, 58, 61, 81, 87, 92, 106, 119, 162, 166, 168, 175, 181

**Summary of Responses**

Responses to this question are summarised below:

- Improve long-term monitoring of appropriate biodiversity mitigation and enhancement measures on development sites. One respondent suggested that a 30-year future management is required.
- One respondent raised the point that they felt there is currently very little monitoring at present, so it is unclear whether mitigation is effective, and how much loss or gain is being achieved. A mechanism to secure, and where necessary, enforce monitoring and management is required. The respondent further suggested this could be achieved through the Biodiversity Supplementary Planning Document (SPD), forthcoming Biodiversity Offsetting strategy and feed into ongoing Nature Recovery Network (NRN) mapping.
- New developments should be required to enhance biodiversity, with high expectations / specific targets set for biodiversity gains, not merely 'encouraged' to do so.
- One developer raised concerns regarding the longer-term monitoring of biodiversity mitigation and enhancement measures on development sites. They felt that, if schemes of mitigation and enhancement are appropriately designed and implemented at the outset, there should be no need for longer term monitoring. Moreover, such monitoring would create an additional cost and practical burden on the development which ought not to be necessary.
- Not all sites should be required to undertake long term monitoring of biodiversity mitigation and enhancement measures on development sites. Monitoring requirements should be agreed on a site-by-site basis.
- Doubtful that the planning / enforcement teams could undertake this work effectively and therefore would suggest that this process be confined to industrial / commercial sites only.
- Impractical to enforce. Suggestion that this concept is only applied to industrial and commercial sites.

## **Stafford Borough Council Response**

Stafford Borough Council recognises that long term monitoring will have beneficial effects for biodiversity. But equally, the council acknowledges the need for clear enforcement.

It is worth noting that the Environment Act 2021 has introduced mandatory Biodiversity Net Gain (BNG) for all developments which gain planning permission after November 2023, with very few exceptions. As part of this any Biodiversity Net Gain habitats will need to be secured for at least 30-years which involves both the management and monitoring of these. Enforcement measures to ensure the BNG is delivered, are likely to be advised as a result of the ongoing BNG consultations.

### **9.D) How should Plan Policies have regard to the new Area of Outstanding Natural Beauty (AONB) Management Plan and Design Guidance?**

There were a total of 12 responses to this question.

**Responses were received from the following respondents:** 3, 6, 17, 25, 37, 38, 74, 75, 101, 102, 103, 181

#### **Summary of Responses**

Points raised by respondents are as follows:

- The AONB Management Plan should be considered at the very beginning of plan preparation, and that it should influence all aspects of the plan making process and inform the approach of the Development Plan.
- The National Farmers Union highlighted that recognition was required that as large areas of the borough are either within the AONB or in close proximity to the AONB, some provision is required to support rural businesses and their need to invest in new infrastructure and modern agriculture buildings. Due to evolving standards, it is essential that businesses are able to evolve to meet them and that these businesses play a vital role in maintaining the landscape.
- Clear criteria should be set out for appropriate development within or impacting on Cannock Chase AONB, including the major developments test for major development within the AONB.
- The highest standards of design for development should be encouraged and any proposed developments close to the boundaries of Cannock Chase AONB and within its setting takes proper account of their impact on the AONB.
- Policies should recognise that Cannock Chase AONB holds nationally important populations of Annex 1 birds, as a further feature subject to the requirements of European law.

## **Stafford Borough Council Response**

The council will ensure the AONB is protected and enhanced through policies within the local plan. The council has considered the comments and issues raised, and the proposed approach will be presented in the Preferred Option.

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

A total of 35 respondents made representations in respect of this issue.

**Responses were received from the following respondents:** 3, 10, 11, 12, 14, 15, 17, 22, 24, 27, 36, 37, 38, 39, 41, 54, 57, 58, 74, 75, 81, 87, 92, 94, 100, 101, 102, 103, 106, 119, 162, 168, 171, 175, 181

### **Summary of Responses**

There was general support for the increase of tree cover within the borough. Responses are summarised as follows:

- Policies need to be created that ensure newly planted trees in large developments are managed from the beginning and that there are not gaps in the maintenance e.g. from development to management company. In addition, specific measures are required to ensure adequate management of planted trees is provided for on these developments to ensure their long-term viability.
- Policies need to be strengthened to ensure that trees are protected and if not, there are appropriate consequences.
- All trees onsite should be protected, and no work should take place within the safeguarded root zone.
- Hopton and Coton Parish Council advocated for the advice from The Woodlands Trust to be followed.
- Natural England welcomed the approach to providing a specific policy to maintain and enhance tree cover in the area. In particular, they would welcome a policy to protect ancient woodland, aged and veteran trees.
- Recommendation of using the Nature Recovery Network Report, along with the Draft Staffordshire Landscape Character Assessment 2015, to ensure that the right tree gets planted in the right place.
- Stafford and Stone Green Party considered that the proposal did not go far enough. It was considered that the local plan needs clearly identifiable tree cover targets and a commitment to delivering those through the levers available within the borough. They also felt that the proposed approach falls short of the level of commitment needed to genuinely deliver on the councils' climate change ambitions.

- The MOD supported, in principle, the approach but noted that any policy relating to this topic within the local plan should not be too onerous or place undue burden on development, particularly that which is only small in scale. Therefore, the MOD has concerns over the potential blanket protection of all of the tree stock which paragraph 9.25 appears to imply.
- Need to ensure that tree planting is done strategically and based on evidence, under the principle of 'right tree, right place'. In some cases, tree planting is not always appropriate. For example, this can have a detrimental impact on some of the priority open habitats found within the borough.
- Staffordshire Wildlife Trust felt that the approach could be strengthened, with further evidence and realistic targets for increasing cover. They suggested increasing woodland cover to at least the national average of 10% within the plan period. Data on tree cover across the borough and in settlements would show where levels are lowest and where targeted action could be taken through new developments or Green Infrastructure (GI) projects.
- The council could consider adopting policies similar to the National Policy, which has a specific SPD that has supporting policies that require a specific percentage of all developments to provide tree planting or other complimentary habitats, or a commuted sum to help provide this elsewhere.
- Identify specific sites for woodland creation that will link existing woodlands especially ancient woodlands, enhance degraded landscapes, and provide screening.
- A Hedgerow Restoration Fund could be created to restore, enhance and plant more hedgerows, including increasing hedgerow trees.
- Suggestion that the council could consider establishing community forests where appropriate guided by the GI strategy.
- One respondent suggested the council should adopt a policy for tree replacement to compensate for loss of existing trees based upon the size of the trees to be lost. They also recommended that the replacement trees should be specified, with these ideally being UK and / or Ireland sourced and grown stock to support biosecurity.
- A Tree Strategy be developed and adopted by the council, with set targets.
- That existing tree stock within the borough be adequately protected from removal or damage based on whether the trees are within Ancient Woodland, Tree Preservation Order (TPO) designated, veteran trees, Category A or Category B trees in accordance with paragraph 175 of the NPPF. Trees not within these categories should not be protected.
- Support to owners of trees should be increased, including help, advice and grants to plant and maintain trees.
- Establish excellent partnership working, set ambitious targets, link strongly to Climate Emergency and health and well-being benefits and work with experts.
- The risk is that development will be looked upon as more benign simply by planting a few trees.

- One respondent would like to see the Community Infrastructure Levy (CIL) funding attributed to the creation of new woodlands.
- Several developers expressed concern over a potential blanket policy requiring all new development to contribute to a borough wide scheme to increase tree cover, with evidence needed in support of this proposal in terms of ensuring viability. The policy may be better judged on a site-by-site basis rather than as a blanket approach.
- Concern over whether new policies or any other measures will require greater resources to realise these in practice.

### **Stafford Borough Council Response**

Stafford Borough Council will consider how existing tree stock can be protected and more trees can be planted as part of new development. In addition, the council is keen to proactively respond to the issues the climate emergency will raise. The proposed approach to these matters will be detailed in the Preferred Option.

**9.F) Should the Council consider a policy requiring that new developments take an active role in securing new food growing spaces? Please explain your answer.**

**If yes, which of the following measures are appropriate:**

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

<b>Response</b>	<b>Count</b>
Agree / Yes	15
Disagree / No	8
Other Comments	6
No View Expressed	152
<b>Total</b>	<b>181</b>

**Responses were received from the following respondents:** 3, 17, 19, 22, 24, 25, 37, 39, 54, 56, 57, 58, 74, 75, 81, 87, 92, 94, 100, 101, 102, 103, 106, 111, 119, 127, 162, 168, 181

### **Summary of Responses**

Responses to this question were varied with clear points made both for and against a policy.

The main points raised by those in favour of a policy securing food growing spaces are summarised as:

- Increasing allotments will benefit the whole community by giving opportunities for multi-generation interaction, learning of new skills, better health and well-being, and activities supported by community groups and charities.
- This will help to reduce the need to import food and also provide healthy outdoor exercise.
- Policy would support a strategic approach to Green Infrastructure.
- This approach is supported in principle but should not be used to preclude or block development, but to help inform good design which incorporates applicable elements.
- Allocation of low-density housing sites and land can help to bring this about.
- It is likely to only be effective on large development sites. It should be done on a site-by-site basis.

Those respondents who were not in favour of the policy, raised the following:

- A policy would not go far enough. Greater protection of county farms is required.
- It will not always be practical and possible for developments, including major residential developments, to incorporate edible planting and growing spaces.
- Quality of land required for optimum growth of food would not necessarily be found on sites suitable for development, and often require large areas of land to ensure appropriate separation distances and drainage can be achieved for large quantities of produce to support the residential development.
- Such a policy would reduce the amount of developable area thus, resulting in increased encroachment into the countryside to meet the housing needs of the borough.
- Proposal is not viable and recommends the use of CIL to invest in the connectivity (transport, communications and upgrading electrical networks) of rural communities.
- No evidence presented in the Issues and Options Paper which indicates that there is a shortage of allotment and / or community garden facilities across the borough.
- Gardens provide the most convenient place to grow food and as the population ages, smaller plots are desirable. Planting trees on temporarily cleared sites makes little sense if they are cut down before they reach their prime. Some new planting should be allocated to wood pasture with open glades to aid biodiversity. Plantation stands of conifers do not support biodiversity.

Other related comments:

- Long-term management and monitoring mechanisms need to be considered.

- Policy should include support for farm infrastructure improvements, some of which will be regulatory requirements to protect the environment and is necessary for food production.
- Plan should safeguard the long-term capability of the best and most versatile (BMV) agricultural land. The plan should make clear that areas of lower quality agricultural land should be used for development in preference to best and most versatile land. Retaining higher quality land enhances future options for sustainable food production and helps secure other important ecosystem services. In the longer term, protection of BMV land may also reduce pressure for intensification of other land.
- The plan should recognise that development, i.e. soil sealing, has an irreversible adverse and cumulative impact on the finite national and local stock of BMV land.
- One respondent commented that soil, a finite resource, fulfils many roles that are beneficial to society. As a component of the natural environment, it is important soils are protected and used sustainably.
- Any policy should be justified by the council's evidence base and is deemed as "justified" and therefore sound as set out in paragraph 35 of the NPPF.
- Any policy should reflect the fact that communal food growing spaces are not the only option and that private gardens may also provide spaces and opportunities for individuals to grow their own food.
- There is already a number of open space requirements that will be associated with the provision of new developments, and these need to be managed to ensure the actual provision meets the needs of the local community and also that scheme viability is not affected
- Policy approach would allow the reduction in private garden space provided communal space is provided. This has a long-term negative consequence on the health and well-being of a population.
- Greater emphasis should be placed upon planting trees in low grade agricultural land, new developments should have a mandatory CO<sub>2</sub> offset scheme to aid with additional tree cover. The farming community should be encouraged to increase tree cover and hedgerow density.

### **Stafford Borough Council Response**

The council will consider if and how new food growing spaces should be promoted through the local plan, ensuring justification and a clear evidence base inform any policy creation. Additionally, the council recognises the important and essential role that working farms have within the Borough in terms of the economy and food security.

Stafford Borough Council has considered its proposed approach which will be presented in the Preferred Option.

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

<b>Response</b>	<b>Count</b>
Agree / Yes	24
Disagree / No	2
Other Comments	1
No View Expressed	154
<b>Total</b>	<b>181</b>

**Responses were received from the following respondents:** 3, 17, 19, 22, 24, 25, 29, 34, 37, 39, 54, 57, 58, 74, 75, 80, 81, 87, 92, 100, 101, 102, 103, 106, 162, 171, 177

### **Summary of Responses**

The majority of respondents to this question were in support. The responses received are summarised below:

- Natural England supports specific policies requiring new developments to minimise and mitigate the visual impacts, but asks for light pollution and noise pollution to also be included as part of this.
- Natural England also suggested the local plan should identify relevant areas of tranquillity and provide appropriate policy protection to such areas as identified in the NPPF (paragraphs 100 and 180).
- Staffordshire Wildlife Trust suggests this would help contribute to the NRN and GI objectives, and encourage design that reflects the importance of landscape settings.
- One respondent suggested the council should include policy wording which makes it clear that landscape impacts vary on a site-by-site basis and assessment should therefore take place on this basis.
- Provided that the context is clearly justified, it would be sensible and appropriate to include positively worded policies which would require a Landscape and Visual Impact Assessment (LVIA) to accompany and inform development proposals.
- One developer suggests that any such policy should focus on “protecting and enhancing” value landscapes, “recognising” the intrinsic character and beauty of the countryside and ensuring that new developments are “sympathetic” to character and landscape setting in accordance with the NPPF (paragraphs 127 and 170).
- Another respondent suggested the council should refrain from the inclusion of overly restrictive policies that could potentially prohibit or deter otherwise sustainable development.
- One respondent felt a specific policy was not required as major developments are already required to assess their impact on the landscape through the



council's Planning Validation Criteria (August 2019) which they consider is sufficient. Unless the council's landscape evidence base shows there to be particular sensitivities that require review at the plan making stage, they consider that detailed landscape issues should be left for detailed assessment upon submission of a planning application.

### **Stafford Borough Council Response**

Stafford Borough Council notes the comments made in respect of this issue and its proposed approach will be presented in the Preferred Option.

### **9. H) Do you consider there are areas in the borough that should have the designation of Special Landscape Area? If so, please explain where:**

A total of 17 respondents made representations in respect of this issue.

**Responses were received from the following respondents:** 8, 17, 22, 24, 27, 29, 39, 54, 74, 75, 100, 101, 102, 103, 162, 171, 172

### **Summary of Responses**

Suggestions for areas to have the designation of Special Landscape Areas were:

- Eccleshall
- The area to the north, west and south of Beacon Hill (above Beaconside)
- Some of the low-lying ground next to flood plains
- Beacon Hill Wood
- Moddershall Valley Conservation Area
- Hixon Airfield
- Areas of very high and high distinctiveness habitats, as shown on the Habitat distinctiveness map for Stafford borough within the Nature Recovery Network Mapping 2019. Which might include:
  - Sow and Penk River corridors
  - The ancient woodlands and parklands around Swynnerton and Trentham
  - The ancient woodlands and historic parklands on the River Trent at Shugborough, Tixall and Ingestre
  - The ancient woodlands and streams to the northeast of Stone
  - The meres and mosses of Aqualete, Gnosall and Norbury
- Local Green Space, play space and sports facilities.

There were some responses that questioned the policy approach of having Special Landscape Areas, with these responses summarised below:

- One respondent felt this is now considered a somewhat dated approach. Instead, each case should be considered on its own merits.

- Designation would require a costly and time-consuming survey and landscape evaluation of the whole of the borough.
- Several respondents considered that further evidence is required if further designations are sought to determine landscape is 'special' or 'valued'. This should be evidenced having regard to the criteria provided by the Landscape Institutes' Guidelines for Landscape and Visual Impact Assessment.

Other related responses were:

- New development should be required to minimise adverse impacts on landscape setting but if mitigation is necessary, it suggests the development is probably in the wrong place.
- One respondent would like to see a more rigorous enforcement of planning rules.
- Advocate review of Use Classes most appropriate to the Town Centres and Conservation Areas and the restrictions for moving between classes. In particular the respondent was concerned about the ease of acquisition of A5 use within the Stone Conservation Area.
- One respondent noted the identification of local green spaces within the Stone Neighbourhood Plan and advocated the recognition of these spaces within the Plan.
- The use of Special Landscape Areas (SLAs) should only be used where they can genuinely provide additional protection to something which needs protecting, and they should not be allowed to be used in order to stop the development of, for example, and indeed, in particular, windfarms.

### **Stafford Borough Council Response**

Stafford Borough Council notes the suggested areas proposed for SLAs and has considered these suggestions throughout the plan process.

The council is keen to protect our highest quality areas and places. As such, SLA designation could be an opportunity to provide protection for locally significant and attractive landscapes that are of comparable quality to Areas of Outstanding Natural Beauty (AONB).

The ability of changing from one use class to another is a national policy and therefore local planning policy cannot contradict or go against national guidance.

### **9.I) Should the new local plan:**

- 1. Adopt a broad definition of historic environment encompassing a landscape scale and identification with natural heritage rather than the current protection of designated heritage assets approach?**
- 2. Take a broader and more inclusive approach by explicitly encouraging the recognition of currently undesignated heritage assets, settlement morphology, landscape and sight lines?**
- 3. Require planning applications relating to historic places to consider the historic context in respect of proposals for, for example, tall buildings and upward extensions, transport junctions and town centre regeneration.**
- 4. Encourage the maximisation of the wider benefit of historic assets by their incorporation into development schemes through imaginative design.**
- 5. Consider historic places and assets in the context of climate change permitting appropriate adaptation and mitigation measures.**

A total of 22 respondents made representations in respect of this issue.

**Responses were received from the following respondents:** 3, 17, 22, 24, 25, 29, 34, 54, 57, 58, 80, 81, 85, 87, 92, 106, 119, 120, 162, 171, 177, 181

### **Summary of Responses**

From the responses received there was no clear consensus on what policy approach to take. Options 2, 3 and 4 were each specifically highlighted as a preferred approach by some respondents.

The following comments were received in response to the question:

- One respondent felt that it was unclear what options / questions 3 and 4 were referring to, as they felt these would be points which are already considered and consulted on through the planning application stages.
- There was the recommendation that 'historic' parks and gardens is amended to 'registered' parks and gardens.
- One respondent raised questions related to the evidence base in terms of whether the council had a local list of heritage assets, and whether or not the Conservation Area Appraisals and Management Plans are adopted and up to date.
- There was support of the recognition of how the historic environment supports the local economy and it should be considered if this could be developed elsewhere in the Plan.
- One respondent suggested that option responses will differ for different parts of the borough.

- The council should be careful not to discount the protection of designated heritage assets over the protection of historic environments at a broader landscape scale. Any definition adopted must be careful to be compliant with the heritage policies of the NPPF in order to enable it to be justified. Heritage Assets in themselves are very important, but they should not be viewed in isolation. Local character of the area in respect of building style should also encompass non-designated Heritage Assets.
- The National Farmers Union strongly disagreed with Option 1, as it could be interpreted as an attempt to extend planning controls over agricultural activity. They also felt that Option 2 was problematic as it may not be practical for development, specifically on working farms, to avoid impacting on landscapes and sight lines. Both policy options have the potential to stifle rural development and the rural economy especially as some infrastructure improvements will be regulatory requirements to protect the environment and is necessary for food production.
- A detailed comment was received from one respondent who questioned the appropriateness of having a broad definition for the historic environment. They felt that this was not the appropriate approach and instead suggested that each heritage asset should be judged on its individual merit on a case-by-case scenario when put in context the heritage asset itself, its surrounding landscape and the proposed development which relates to the heritage asset. In addition, the NPPF provides sufficient protection to heritage assets.
- One developer suggested that there is sufficient policy and guidance in the NPPF and PPG that deals with both designated and non-designated heritage assets, which has a sufficient framework for the control of development affecting such assets, so that no additional or different measures of control are either necessary or justified.

### **Stafford Borough Council Response**

Stafford Borough Council will continue to protect and enhance the historic assets within the borough. However, local policy will not seek to repeat national guidance and policy.

Enforcement issues related to the historic environment are noted and the council will respond to such matters within its existing powers. However, enforcement actions are outside the remit of the local plan and are dealt with via other national legislation.

In addition, the council recognises the important role agriculture and working farms play to the local economy. It is acknowledged that these rural enterprises will have specific requirements that will need to be considered going forward.

The council's proposed approach will be detailed in the Preferred Option.

**9.J) Do you consider that the current “Design” SPD provides sufficient guidance for design issues in the borough? Please explain your rationale.**

A total of 23 respondents made representations in respect of this issue.

**Responses were received from the following respondents:** 3, 7, 17, 22, 24, 34, 36, 40, 54, 57, 58, 74, 75, 80, 81, 87, 93, 94, 102, 103, 106, 119, 162

**Summary of Responses**

Responses received in relation to this question were varied. Responses indicated that further guidance was required on:

- Development in Conservation Areas
- Conversions from Class B use to residential.
- Provision of charging points for electric cars and space to park to charge them not only on residential properties but on shops, pub and community hubs

Some responses provided guidance more generally in terms of what the SPD should cover:

- Recognition that design will alter of the context of where it is occurring. That some areas within the borough could promote modern designs whereas others must meet the character of the area.
- That the SPD should reference to the Active Design Guidance produced by Sports England and the 10 principles should be expanded within the SPD.

Related comments were:

- Revised SPD should be consulted upon as part of the local plan and should be updated to reflect National Design Guidance.
- Any design policy should be informed by an understanding of what design currently exists through for example, urban and landscape characterisation studies, conservation area appraisals and management plans, an understanding of the significance of the historic environment and heritage assets and how new design could complement this in new development.
- Policy needs to be monitored and enforced so that locally distinctive, high-quality design that responds to its context is delivered on the ground
- The MOD highlighted that due to the nature of defence buildings, including their operational and technical requirements, the opportunity to be flexible with the design of development may be reduced. As a result of this, it was suggested that the policies should have a degree of flexibility to account for such cases.
- One set of design rules is not appropriate in all locations and therefore a borough wide policy would be detrimental to some development sites coming forward. The inclusion of too many policies dictating the type, tenure, size, quantity of dwellings and requiring complex or Large-Scale Development to

be subject to review by a Regional Expert Design Panel, risks a lack of individuality and a lack of consideration given to the surrounding character.

- NPPF and the existing Design SPD provide enough guidance. There is no need for a separate policy in the new local plan seeking to ensure that new developments achieve a good level of design standard.
- The SPD should be reviewed and consider issues of sustainable design and carbon neutrality specifically in more detail.
- Current system is acceptable. Restrictions already prevent enhancements which would help the elderly, disabled or those with prams.

### **Stafford Borough Council Response**

The council notes the suggested areas that further guidance is required on within the Design SPD. These have been considered throughout the Plan process and the council's proposed approach will be detailed the Preferred Option.

### **9.K) Do you consider that the current “Shop Fronts and Advertisements” SPD provides sufficient guidance for shop front and advertisements issues in the borough? Please explain your rationale.**

There were a total of 2 responses to this question.

**Responses were received from the following respondents: 22, 162**

### **Summary of Responses**

Responses to this question were limited and the only extended comment was that guidance should be very specific in relation to Conservation Areas and include character of specific locations.

### **Stafford Borough Council Response**

The council notes the responses and will continue to enhance the built environment. The council's proposed approach will be detailed in the Preferred Option.

### **9.L) To support a new Local Design Review Panel should the New Local Plan:**

#### **9.La) Require complex or Large-Scale Development to be reviewed by a Regional Expert Design Panel?**

<b>Response</b>	<b>Count</b>
Agree / Yes	8
Disagree / No	13
Neutral/Other Comments	3
No View Expressed	157
<b>Total</b>	<b>181</b>

## Should this form a material consideration in the planning process?

Response	Count
Agree / Yes	8
Disagree / No	10
No View Expressed	163
<b>Total</b>	<b>181</b>

Please note not everyone answered both parts of this question.

**Responses were received from the following respondents:** 3, 17, 22, 24, 33, 37, 39, 54, 57, 58, 61, 74, 75, 80, 92, 93, 101, 102, 103, 104, 106, 110, 162, 181

### Summary of Responses

Whilst more respondents were positive for the policy approach, the only comments made were:

- The proposed approach would help get all disciplines involved, to achieve good environmental design and find sustainable solutions.
- Offers the most in terms of delivering well designed places that respond to the specific, Stafford, setting.
- Locals should be involved and consulted more to gain a better understanding of the local concerns.

Responses against can be summarised as follows:

- Design is subjective and open to interpretation. There needs to be the opportunity for the applicant to justify their rationale for the design approach to be taken.
- It ought not to be necessary to introduce a Design Review Panel. The Borough Council is capable of developing a policy framework that exerts an appropriate degree of control in design terms, whilst clearly articulating its ambitions, and then assessing proposals when they are submitted for determination.
- Risk that a Design Panel will slow down planning processes and be an added cost to the developer.
- One developer felt that in respect of a design review panel, it was not considered that their opinion can be used as a material consideration in the determination of a planning application. It is not unusual for design policies to be interpreted in different ways but still arriving at an effective design solution which is policy compliant. Even if a design review panel disagrees with a development proposal, that does not mean it is an inappropriate form of development if it satisfies the design policies.
- “Large-scale” and “complex” are imprecise terms and it should be considered more carefully what these are defined as.

- The Local Planning Authority (LPA) ought to be able to reach a judgment on a case-by-case basis, involving the applicant in the decision, and make appropriate and selective use of Design Review accordingly.
- The Design Review Panel process can materially slow down the design process and often in relation to residential developments, discussions and amendments to the proposed design in outline planning applications, can often become lost or ‘dumbed down’ through the subsequent reserved matters submissions.
- Such a scheme is unlikely to be permitted under current guidance. It would enable developers to claim for damages.

Related comments:

- One respondent suggested that the council should refer to a report by CPRE ‘*A Housing Design Audit for England*’ for additional guidance.

### **Stafford Borough Council Response**

The council acknowledges that some aspects of design are subjective e.g. style. However, many aspects of design are not subjective, and this has been demonstrated by the outcomes of the Design Review processes. The council also agrees that the knowledge of local citizens and groups should be utilised. This could be done through either local characterisation work or direct involvement in the design review processes.

The definition of a ‘large’ or ‘major’ application is already defined in planning legislation. In relation to the terminology ‘complex’ the council will seek to ensure that this is defined if this policy approach is taken forward.

It is worth noting, that most Design Review Panels do allow the applicant an opportunity to present and explain their design approach.

### **9. Lb) adopt (and commit to delivering), nationally prescribed design standards e.g. Manual for Streets, Building For Life, Building Research Establishment (BRE) Homes Quality Mark, etc.?**

<b>Response</b>	<b>Count</b>
Agree / Yes	11
Disagree / No	9
No View Expressed	161
<b>Total</b>	<b>181</b>

**Responses were received from the following respondents:** 3, 22, 24, 33, 37, 39, 54, 57, 58, 74, 75, 92, 101, 102, 103, 104, 106, 110, 162, 181

### **Summary of Responses**

Responses against the application of standards are summarised as:



- The adoption of nationally prescribed standards may assist in the design review process. However, the council should ensure that there is enough flexibility to enable applicants to justify any deviation away from these standards if required.
- Nationally prescribed standards do not require instruction via the local plan. Although they can be useful as a guide, site specific consideration of space standards is required on a site-by-site basis.
- Better to have national standards, with a link in local policy so that policies can be more flexible to national policy change.
- Several developers felt that it should be left to the discretion of developers as to whether or not a higher building standard e.g. (BREEAM, BRE etc.) is applied as there is no mandatory requirement.
- Could produce national sameness rather than sense of place.

### **Stafford Borough Council Response**

The UK Government has made a commitment to carbon neutral development by 2050. To achieve this, local plans need to be proactive in promoting low carbon developments now.

Stafford Borough Council is aware of future consultations on changes to the building regulations and Future Homes Standards. These consultations and the outcomes of them will be reflected in the development of the local plan. Furthermore, the local plan and its constituent policies have been prepared in light of Stafford Borough Council's Climate Change and Green Recovery Strategy 2020-2040 and the Staffordshire County Council Climate Change Adaptation and Mitigation study.

### **9.Lc) Reconsider and update local design policies to reflect current national best practice, be based upon local Characterisation studies, and be aligned with related and companion policy?**

<b>Response</b>	<b>Count</b>
Agree / Yes	15
Disagree / No	6
No View Expressed	160
<b>Total</b>	<b>181</b>

**Responses were received from the following respondents:** 3, 17, 24, 33, 37, 39, 54, 57, 58, 74, 75, 92, 101, 102, 103, 104, 106, 111, 120, 162, 181

### **Summary of Responses**

There were limited extended comments received for this question. These which were received are summarised below:

- Local characterisation studies should be undertaken at a scale which takes adequate consideration of the site-specific characteristics.

- This approach offers the most in terms of delivering well designed places that respond to the specific setting.

### **Stafford Borough Council Response**

Stafford Borough Council notes the comments made in respect of this issue.

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

<b>Response</b>	<b>Count</b>
Agree/Yes	13
Disagree/No	9
No View Expressed	159
<b>Total</b>	<b>181</b>

**Responses were received from the following respondents:** 3, 15, 17, 22, 24, 27, 39, 46, 54, 74, 75, 87, 92, 101, 102, 103, 106, 111, 120, 162, 168, 181

### **Summary of Responses**

Responses received to this question can be summarised as:

- There are a number of sites within the borough which would significantly benefit from being designated as local green space.
- Local Green Space (LGS) designation is a mechanism which gives green spaces greater protection against development.
- Extensive developments in the borough could have been more clearly broken up and have a less intense impact on the local area if there were a number of green spaces within that which had been protected in this way
- A previous designation of Local Green Space should not mean the site has to stay in that use in the future. The local plan is a perfect opportunity to review sites and their uses.
- More appropriate to allow the allocation of Local Green Spaces to be left to neighbourhood plans.
- Any designation needs to be consulted upon and not forced upon a community.
- Such designations are unlikely to be necessary.
- The council should enter discussions with the landowners of any sites that the council propose to designate as LGS and all proposed LGS sites need to be supported by evidence which demonstrates how they meet the requirements of paragraph 100 of the NPPF.

### **Stafford Borough Council Response**

It should be noted that open space does not need to be designated as Local Green Space to received protection. Paragraph 99 of the NPPF (2021) protects existing

open space, sports and recreational buildings and land, including playing fields from development unless:

- The space is demonstrated to be surplus to requirements.
- The loss is replaced.
- Or development is for an alternative sport provision which outweighs the loss of the existing.

Any designation of a Local Green Space will be publicly consulted upon at the Preferred Options stage.

### **9.N) General comments received in respect of 9.N.**

There were a number of responses to 9.N which provided more general comments to address the overall theme of the question, rather than answering one of the following specific questions. These comments are worth consideration so have been included in this section.

There were a total of 10 responses which provided general comments to 9.N.

**Responses were received from the following respondents:** 41, 74, 75, 94, 101, 102, 103, 120, 157, 177

### **Summary of Responses**

The general comments can be summarised by the following:

- The commitment to providing parks and open spaces, and the recognition of their benefits for health and biodiversity was welcomed by the Woodland Trust. They also raised the point that tree planting can help address health inequalities as access to green space is not equally distributed across the population.
- Several developers suggested that any policies must be capable of being flexible to support the local context, as thresholds seem rather arbitrary. It was suggested it would be more appropriate to ensure that developments are prepared in line with a design framework, one which references good practice and guidance which may well be subject to change throughout the Plan period.
- The methodology that is selected, in terms of setting thresholds where certain policy aspects will trigger, needs to be robustly justified and evidenced. Furthermore, any standards should only be used as a starting point, with development proposals being considered on a site-by-site basis.
- One respondent felt that across the following questions, the standards that provide the greatest areas of open space and provision should be used.
- Facilities should be provided for traditional games and sports spaces/grounds and for the local community, instead of private facilities.

## **Stafford Borough Council Response**

Stafford Borough Council notes the comments made.

### **9.Na) Do you believe that there are areas within Stafford Borough that are poorly served by public open space. If so, where?**

There were a total of 12 responses to this question.

**Responses were received from the following respondents:** 3, 15, 17, 22, 24, 28, 37, 39, 54, 120, 156, 162

### **Summary of Responses**

Responses to the question did not provide a clear yes / no. However, suggestions were presented as to areas that are poorly served by open space:

- Trinity Fields
- Parkside
- Highfields
- Doxey Parish
- Eccleshall
- Hopton and Coton Parish
- Stone
- Hixon
- Northern side of Stafford
- Southern part of Stafford

Other related comments were:

- Westbridge Park and the Downs Banks was not referenced in the Issues and Options document. Concern was raised that the redevelopment of Westbridge Park in relation to sport facilities could render the space unavailable and less usable for major community events that are key to the community life of Stone.
- The plan should consider the value of local Rights of Way to health and well-being, access to nature and the countryside, delivering modal shift and reducing CO<sub>2</sub> and from an economic (tourism) development perspective.
- Identify gaps in resource via a green space audit and the application of Natural England's ANGSt study.
- Open space needs to be valued as an asset and not just as potential building land.
- One respondent raised the concern about the general reduction of open space for people to enjoy, which has been highlighted during the Covid-19 pandemic.

## **Stafford Borough Council Response**

The council notes the areas identified as poorly served by public space and will consider these areas going forward in the plan process. As part of the local plan evidence base information is being collated on the existing open space within the borough.

The council has considered its position and its policies, and these will be reflected in the Preferred Option Consultation document.

### **9.Nb) Are there any other borough-wide facilities you feel should be associated with open space?**

There were a total of 4 responses to this question

**Responses were received from the following respondents:** 17, 22, 39, 162

#### **Summary of Responses**

Responses to this question was very limited and are summarised as:

- Eccleshall falls short of public open space appropriate for a larger community
- Opportunities for natural play, in semi-natural habitats with natural features such as logs, mounds, water features etc.
- Toilets in areas without public toilets

## **Stafford Borough Council**

Stafford Borough Council notes the comments made.

### **9.Nc) Are there any settlements that you believe are lacking in any open space provision?**

There were a total of 7 responses to this question

**Responses were received from the following respondents:** 3, 17, 22, 24, 39, 54, 120

#### **Summary of Responses**

Identified areas were:

- Woodseaves
- Adbaston
- Swynnerton
- Eccleshall
- Hopton and Coton Parish
- Southern part of Stafford
- Stafford

One response stated that it needs to be ensured that all new development contributes to natural green space.

### **Stafford Borough Council Response**

The council notes the areas identified as poorly served by public space and will consider these areas going forward in the Plan process.

### **9.Nd) Should the Council seek to apply Play England standards to new housing developments?**

There were a total of 6 responses to this question, who were all in support.

**Responses were received from the following respondents:** 3, 17, 19, 24, 39, 54

There were no extended comments to this question.

### **Stafford Borough Council**

Stafford Borough Council notes the responses.

### **9.Ne) Should the Council seek to apply Fields in Trust standard to providing sports and children's facilities?**

There were a total of 6 responses to this question, with 5 in support and 1 against.

**Responses were received from the following respondents:** 7, 15, 17, 24, 39, 54

### **Summary of Responses**

Two detailed responses were received and are summarised as:

- Support for the council applying the Fields in Trust standard to providing sports and children's facilities. As this would allow the best possible access to green space, sport and pitches.
- Against the application of the Fields in Trust standard, the respondent (Sport England) argued that the adopted Playing Pitch Strategy (PPS) is a better tool to use as it utilises the evidence base which informs the local plan as opposed to applying a generic standard for sports facilities.

### **Stafford Borough Council Response**

Stafford Borough Council will ensure that sports and children's facilities are fully considered as part of the preparation of the new local plan. The council has considered its proposed approach, which will be reflected in the Preferred Option.

### **9.Nf) Should the Council seek to apply Natural England's ANGSt to new development?**

There were a total of 6 responses to this question, who were all in support.

**Responses were received from the following respondents:** 3, 17, 24, 39, 54, 181

There were no extended comments to this question.

### **Stafford Borough Council**

Stafford Borough Council notes the responses.

### **9.Ng) Should the Council seek to develop a bespoke standard in relation to open and/or play space?**

There were a total of 4 responses to this question, with 2 in support and 2 against.

**Responses were received from the following respondents:** 3, 17, 24, 54

### **Summary of Responses**

There was only one addition comment, which was made by one respondent who questioned that if there was already a standard available why not use this one instead of creating a bespoke standard and make the standard enforceable.

### **Stafford Borough Council Response**

Stafford Borough Council notes the comment made.

### **9.Nh) Do you consider that developments of over 100 houses should incorporate features that encourage an active lifestyle for local residents and visitors (eg Play areas, open spaces)?**

There were a total of 9 responses to this question, with 7 in support and 2 against.

**Responses were received from the following respondents:** 3, 17, 19, 22, 24, 54, 94, 106, 120

### **Summary of Responses**

Responses received to this question are summarised below:

- Policy should apply to any development of 50 units or more.
- This should not be a mandatory requirement as it could be more beneficial to improve existing local facilities close by. Therefore, any future policies will need to be sufficiently flexible to allow on-site or off-site provision or a financial contribution to be provided to meet the requirements of encouraging an active lifestyle.
- A blanket requirement should not be placed on developments that are over 100 dwellings. These requirements should be assessed against existing local provision and an identified local need, and this should be determined on a site-by-site basis and agreed with the applicant during the pre-application period.

- More information was requested as to why the council selected 100 dwellings to be the threshold. The evidence to support this should be made available for review and comment so it is clear what methodology the council is using.

### **Stafford Borough Council Response**

Stafford Borough Council will ensure that new developments contribute positively to healthy lifestyles. The council has considered its proposed approach, which will be reflected in the Preferred Option. It is worth noting that, any policy approach will be based upon a robust evidence base.

### **9.Ni) Do you consider that developments over 100 houses should provide direct connections from the development to the wider cycling and walking infrastructure?**

There were a total of 9 responses to this question, with 7 in support and 2 against.

**Responses were received from the following respondents:** 3, 17, 19, 22, 24, 94, 106, 120, 162

### **Summary of Responses**

Responses to this question are summarised below:

- Whilst having these facilities is beneficial it doesn't make the development sustainable.
- It should not be a mandatory requirement that new development schemes must connect to both existing cycling and walking infrastructure, as this might not be possible.
- A blanket requirement should not be placed on developments that are over 100 dwellings. These requirements should be assessed against existing local provision and an identified local need, and this should be determined on a site-by-site basis and agreed with the applicant during the pre-application period.

### **Stafford Borough Council Response**

The council acknowledges the comments and has considered its proposed approach, which will be reflected in the Preferred Option.

### **9. Nj) Should the Council require all high-density schemes to provide communal garden space?**

There were a total of 8 responses to this question, with 7 in support and 1 against.

**Responses were received from the following respondents:** 3, 17, 22, 24, 54, 94, 120, 162



## Summary of Responses

Responses stated that:

- The communal garden space should have adequate provision for play areas, seating, exercise and dog walking, with there being security arrangements in place to deter anti-social behaviour.
- Just because a scheme is high-density does not mean that it automatically warrants provision of communal garden space. A high-density scheme can still have the ability to provide private garden space and make the necessary provisions in terms of public open space / sport and recreational facilities even if this is through a financial contribution.
- A blanket requirement should not be placed on developments that are over 100 dwellings. These requirements should be assessed against existing local provision and an identified local need, and this should be determined on a site-by-site basis and agreed with the applicant during the pre-application period.

### Stafford Borough Council

The council acknowledges the comments and has considered its proposed approach, which will be reflected in the Preferred Option.

### 9.O) General comments received in respect of 9.O.

There were a number of responses to 9.O which provided more general comments to address the overall theme of the question, rather than answer one of the following specific questions. These comments are still worth consideration so have been included in this section.

There were a total of 5 responses which provided general comments to 9.O.

**Responses were received from the following respondents: 74, 75, 101, 102, 103**

### Summary of Responses

A number of developers provided a similar response, this has been summarised by the following:

- All policies and proposals will need to demonstrate deliverability and any future requirements will need to be justified in order to provide certainty in terms of compliance with Regulation 122 of the CIL Regulations and the need for developer contributions should these be required.
- Further evidence will be required in respect of new sporting facilities as the Plan progresses and this should be informed by any corporate strategy prepared by the borough council.

## **Stafford Borough Council Response**

Stafford Borough Council notes the comments made in respect of this issue.

### **9. Oa) Should the Council seek to designate land within the New Local Plan 2020-2040 to address the borough-wide shortage of new sporting facilities?**

There were a total of 13 responses to this question, who were all in support.

**Responses were received from the following respondents:** 3, 7, 10, 11, 14, 15, 17, 22, 24, 54, 92, 120, 162

### **Summary of Responses**

Responses stated that:

- The designation of land for sporting facilities is supported as it would proactively address the borough-wide shortages.
- New estate areas should have some space set aside for recreation even if facilities are not provided.
- Existing pitches within communities need to be retained.
- Sport England supports the undertaking of the indoor and outdoor strategies which identifies specific needs required to be accommodated within the local plan. The response highlighted the findings within the Playing Pitch Strategy should be utilised to inform future demand as opposed to taking account over provision within another locality, which is the approach taken within the consultation document.
- S106 agreements should not be used as a way of getting provision to support distant sites.
- If possible, smaller and more local facilities which serve the local area may be more preferable as these local facilities can be visited easily and more often rather than major facilities which may provide logistical challenges to visit.

## **Stafford Borough Council Response**

Stafford Borough Council acknowledges the responses received and will consider these as part of the ongoing Plan preparation. At this stage, the council's proposed approach will be presented in the Preferred Option.

### **9. Ob) Should the Council identify within the New Local Plan 2020-2040 the site in which a new swimming pool should be developed?**

There were a total of 9 responses to this question, with 8 in support and 1 against.

**Responses were received from the following respondents:** 11, 14, 15, 17, 54, 92, 119, 120, 162

## **Summary of Responses**

Responses stated that:

- One response highlighted that Eccleshall would be a good location for the new swimming pool.
- It was unlikely that a new swimming would be viable, as in recent times most pools in the area have closed.

## **Stafford Borough Council Response**

Stafford Borough Council notes the comments made in respect of this issue.

## Section 10 – Environmental Quality

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

**10.Aa) Ensure the installation of infrastructure to support the transition from petrol and diesel to electric powered vehicles on every major development?**

<b>Response</b>	<b>Count</b>
Agree / Yes	15
Disagree / No	6
More information required / Other Comments	5
No View Expressed	155
<b>Total</b>	<b>181</b>

**Responses were received from the following respondents:** 3, 8, 17, 19, 22, 24, 27, 28, 39, 54, 57, 58, 87, 92, 94, 101, 102, 103, 104, 106, 110, 120, 162, 168, 177, 181

### Summary of Responses

The extended comments made in respect of this question showed a significant variation in view with three broad categories of view towards the appropriate policy approach being expressed:

- 1) That extensive investment in electric vehicle charging points should be made including in new developments to facilitate the shift to carbon neutrality.
- 2) That all options to facilitate the shift to carbon neutrality should be kept open including, for example, hydrogen powered vehicles.
- 3) That further evidence is required prior to the necessary investment being made.

Further, a small minority suggested that this was not a planning matter rather legislation or Buildings Regulation and that natural evolution of travel methods would deal with the issue.

In respect of those in support of the installation of infrastructure to support the transition from petrol and diesel to electric powered vehicles on every major development the following comments were made:

- The Chambers of Commerce strongly feels that, in order to achieve the government's aim to bring all greenhouse gas emissions to net zero by 2050, now is the time for investment in more electric vehicle (EV) charging points across the borough. The current level of public EV charging points in the

borough will not instil the confidence needed by motorists to switch from petrol and diesel cars to electric vehicles.

- The suggestion that the borough’s current provision for electric car infrastructure is not sufficient to accommodate the average electric car usage and will therefore stifle movement and economic growth across the borough.
- A concern that at current rates of infrastructure provision and growth of electric car ownership, future rates of electric car usage in the borough will be artificially limited by availability of charging infrastructure.
- One respondent in supporting the principle of the provision of charging points suggested that all new houses should have access to an off-road car charging point within e.g. 100 yards of home, which could be in a shared parking area.
- One respondent, who was in support of the proposal, wanted to highlight that in transition to electric powered vehicles, issues of air quality will shift from the impacts of nitrogen oxides (NOx) to fine particulate pollution, which can come from tyres. This still has health implications.

In respect of those requesting greater evidence a number of points were made:

- There are currently a variety of charging systems each demanding different connections and electrical loadings. Therefore, it will be necessary to ensure that any infrastructure provided is able to meet this range of requirements and that the utility companies are able to provide sufficient power.
- The impact on the viability and deliverability of development will need to be assessed.
- Would be useful to provide examples of where such technology has been used and can be evidenced as a workable and viable solution.

### **Stafford Borough Council Response**

Stafford Borough Council notes the comments made and will continue to consider the ways that it can contribute to the achievement of lifestyle changes including choice of transport mode in pursuit of the council’s zero carbon strategy.

### **10.Ab) Ensure all major development is accessible by regular public transport?**

<b>Response</b>	<b>Count</b>
Agree / Yes	15
Disagree / No	3
No View Expressed	163
<b>Total</b>	<b>181</b>

**Responses were received from the following respondents:** 3, 8, 17, 22, 24, 27, 39, 54, 57, 58, 81, 92, 94, 106, 120, 162, 168, 181

## Summary of Responses

There was wide agreement that, where possible, all new development should be directed towards the most sustainable locations. Some respondents explicitly linked this to the achievement of the borough's Climate Change ambitions. Specific points made included:

- Where development is required in the more rural areas of the borough it is not always possible for this to be sustainably located and that it is important to consider the range of services and facilities which are easily accessible by other modes of sustainable transport, e.g. walking and cycling.
- Two respondents, whilst being supportive in principle, requested clarification as to what was meant by "regular public transport" and "major development".
- Consideration should also be given to the potential improvements to the frequency and type of public transport available. Therefore, just because a site may not currently be served by a mode of public transport, there is the opportunity that the development of it will improve its sustainability, as well as the sustainability of the area around it.
- One respondent suggested that all major development should be accessible by regular public transport, and this should be enforced by inspection and fines. The Stafford Local Plan previously said all new housing should be within 5-minute walk of a bus, however, many bus routes have closed or thinned. There is the potential that priorities might change, and all development should have the potential for running suitable buses within about half a kilometre.
- Another respondent suggested that the lack of decent public transport provision is already a significant problem in some of the developments in Stafford and hampering the affordability of even the most affordable houses. Hence it was suggested that public transport provision must be a significant part of all planning decisions of 10 or more dwellings.

## Stafford Borough Council Response

Stafford Borough Council notes the comments made and will continue to work with the County Council and public transport providers to achieve suitable levels of public transport services.

## 10.Ac) Enforce Air Quality Management Zones around areas of notable biodiversity importance?

Response	Count
Agree / Yes	12
Disagree / No	3
More information required / Other Comments	2
No View Expressed	164

<b>Total</b>	<b>181</b>
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**Responses were received from the following respondents:** 3, 8, 17, 22, 24, 27, 39, 54, 92, 94, 101, 102, 103, 120, 162, 168, 181

### **Summary of Responses**

There were three main stances represented in respect of this question namely:

- 1) Those in unequivocal support.
- 2) Those that felt this would be a lessening issue as new technologies, e.g. electric cars, were adopted.
- 3) Those that consider more evidence is required.

Specific points made included:

- Some concern was expressed that whilst in theory air quality may be “legally binding” it is perceived as fairly uncontrollable. Similarly, it was highlighted that as part of the statutory consultee process to planning applications the council, via its Environmental Health and Air Quality consultants, ensures the current thresholds are being adhered to.
- One respondent in qualified favour of the approach suggested that the employment of air quality management zones should not be restricted to only areas of notable biodiversity importance but should also be extended, in view of the health risk of poor air quality, to the places where the most vulnerable people in our society, e.g. nurseries, schools, retirement homes, can potentially come into contact with dangerous pollutants.
- In respect of those suggesting more evidence was required in terms of Air Quality Management Zones it was suggested that such evidence should consider the potential impact upon sites of biodiversity, given that these will vary, and whether such zones would achieve proposed outcomes.
- Air quality management zones should be as part of a wider strategy to improve air quality across the borough.

### **Stafford Borough Council Response**

Stafford Borough Council notes the comments made.

### **10.Ad) Employ any further methods which you consider will aid in the improvement of air quality within the borough?**

A total of 10 respondents made representations in respect of this issue.

**Responses were received from the following respondents:** 3, 8, 17, 22, 39, 92, 120, 162, 168, 181

## Summary of Responses

Very few written comments were received in respect of this question. Those received advocated the use of trees, hedgerows and other green infrastructure to help improve air quality, along with the range of other multifunctional benefits such as biodiversity, reducing the urban heat island effect, sustainable drainage etc. In addition, Green Infrastructure (GI) can help to landscape development areas in such a way that air quality is maintained or improved, not just through deposition but also through adjusting air pollution exposure levels to reduce concentrations.

## Stafford Borough Council Response

Stafford Borough Council notes the comments made.

### 10.B) Should the Council enforce a scheme whereby any development likely to result in an increase of NO<sub>2</sub> deposition on these sites in Stafford borough must contribute to a mitigation programme?

Response	Count
Agree / Yes	12
Disagree / No	2
Other Comment	7
No View Expressed	160
<b>Total</b>	<b>181</b>

Responses were received from the following respondents: 3, 8, 17, 22, 24, 27, 29, 37, 39, 74, 75, 92, 94, 101, 102, 103, 106, 120, 162, 168, 181

## Summary of Responses

A number of comments were received with a minority of these commenting on the difficulty and complexity of this issue. Below are the summarised responses:

- One respondent cited the Netherlands where national schemes have been shown to be more effective than local attempts.
- Natural England welcomed this question and the attention given to this important issue in the consultation document. They provided a longer response with their main points being:
  - They advised that one of the main issues which should be considered in the plan and the SA / HRA, are proposals which are likely to generate additional nitrogen emissions as a result of increased traffic generation, which can be damaging to the natural environment.
  - The effects on local roads in the vicinity of any proposed development on nearby designated nature conservation sites, including increased traffic, construction of new roads, and upgrading of existing roads, and the impacts on vulnerable sites from air quality effects on the wider road network in the area, i.e. a greater distance away from the development, can be assessed using traffic projections and the 200m



distance criterion followed by local Air Quality modelling where required.

- They consider that the designated sites at risk from local impacts are those within 200m of a road with increased traffic, which feature habitats that are vulnerable to nitrogen deposition/acidification. APIS provides a searchable database and information on pollutants and their impacts on habitats and species.
- Also recognise that a Strategic Nitrogen Action Plan (SNAP) is in the early phases of development and have committed to continue to work with the local planning authorities in the Cannock Chase Special Area of Conservation (SAC) partnership to collate an evidence base to determine a strategic solution.
- An evidence-based policy enforcement approach was welcomed by a number of respondents since this would assist in the application process and in the assignment of any revenues gained. This was especially the case in respect of the Cannock Chase SAC which engages a number of other local authority areas.
- The council should work with the landowners of all sites that are proposed to be allocated within the local plan that may need to contribute towards this programme to ensure that the council will be able to demonstrate to a Planning Inspector the deliverability of such a scheme.
- A stated need to consider ammonia deposition as well as NO<sub>x</sub>. This is because techniques to remove NO<sub>x</sub> from vehicles and industrial processes are becoming widely used, but these generally emit NH<sub>3</sub>, which is at least as damaging to habitats as NO<sub>x</sub>.
- The need to protect mature trees and hedgerows.
- One respondent suggested that any mitigation should be sought on a case-by-case basis.
- Some concern was raised in respect of the assumption that any mitigation scheme will be effective in avoiding the disruption and destabilisation of these vulnerable ecosystems. In order to counter this concern, it was argued that the council should have a sufficiently strong policy base in place to allow the council to refuse developments on those grounds, rather than allow them to go ahead and build it with some sort of token gesture towards mitigation elsewhere.
- A number of developers consider that further evidence is required to show what the impact is likely to be and whether this impact arises as a consequence of proposed development, in order to justify the need for mitigation. Further, that any mitigation strategy would also need to consider the effect upon Plan viability.
- One respondent queried why this was an issue for the plan stating that NO<sub>2</sub> is primarily a risk to human health and is worst where traffic levels are high. The

respondent was not clear why internationally designated sites, such as Chartley Moss, should be singled out.

- One respondent suggested that prevention is better than cure so the council should avoid any development that produces NO<sub>2</sub> and that if the development is essential a high standard of mitigation should be applied and enforced.

### **Stafford Borough Council Response**

Stafford Borough Council welcomes the broad support for the proposed approach.

The council also notes and supports the work being undertaken with a range of interested bodies in respect of the Cannock Chase SAC Partnership including initial evidence on the Strategic Nitrogen Action Plan and believes this approach will meet many respondent concerns.

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

There were a number of responses to 10.C which provided more general comments to address the overall theme of the question, rather than answer one of the following specific questions. These comments are still worth consideration so have been presented in this section.

There were a total of 8 responses which provided general comments to 10.C.

**Responses were received from the following respondents:** 29, 34, 74, 75, 102, 111, 119, 120

### **Summary of Responses**

- Staffordshire County Council made these comments in respect of 10C:
  - Please note the Waste Local Plan, which forms part of the Development Plan, already requires all major non-waste-related development to, amongst other things, make provision to facilitate separated waste collection systems, and be supported by a site waste management plan. Any proposed new policies should explicitly build on what is set out in that Policy 1.2 of the Waste Local Plan.
  - The Waste Strategy deals only with Municipal Waste which accounts for less than 15% of waste arisings. It is the role of the Staffordshire and Stoke-on-Trent Waste Local Plan (2010 to 2026) to address the provision of waste management facilities for all of the waste produced in the area, and to manage the change in the type of facilities that are required to increase the proportion of waste that is re-used, recycled or recovered.

- In relation to Paragraph 10.13 it is worth noting that the proportion of municipal waste going to landfill has fallen rapidly over the last ten years and has stood at less than 2% since 2014/15 (See our Annual Monitoring Report for details). It might be appropriate to update the discussion to better reflect the current situation. It is unrealistic to suggest that additional land might be sought to increase landfill capacity, but it is still important to continue to act to move as much waste as possible further up the treatment hierarchy (as set out in the national waste strategy).
- At 10.15 it might be helpful to rephrase this paragraph in terms of moving waste treatment up the hierarchy rather than treatment being sustainable or otherwise.
- One respondent suggested that any strategy for waste infrastructure in Stafford borough should consider the impact on the significance of the historic environment, heritage assets and their setting.
- A number of developers stated that more detail is required particularly as this potentially overlaps with the role of the County Council and the Waste Local Plan, which itself is also part of the Development Plan. The developers reminded the council that the local plan for Stafford borough needs to ensure it is in conformity with the Waste Local Plan otherwise considerable confusion and uncertainty will arise.
- Another respondent again stated that further detail is required, but also added that for such a policy to be considered, evidence of needs and viability testing is required to ensure the policy is sound.
- One respondent felt that recycling in Staffordshire seems mixed up compared to other boroughs and overseas. They also suggested better information should be made available and that any targets which are set should be ambitious.
- One respondent made a number of suggestions, which were as follows:
  - Require developers to contribute financially and materially to waste recycling plants and facilities.
  - Require major stores to sort plastics for recycling so that consumers can return to them plastics if they are unsure about whether or not they are recyclable given that the indications used on plastics are often too small to read or illegible.
  - Impose a levy on major stores to cover the cost of disposing of plastics that cannot be recycled.
  - Impose fines on local businesses in areas where trash they have generated is left lying in the streets.
  - Impose fines on motorway service / maintenance companies where motorways are left covered in trash to cover the clean-up costs.

## Stafford Borough Council Response

Stafford Borough Council notes the comments made and these have been considered in the preparation of the Preferred Option.

### 10.Ca) Should the Council consider a policy requiring all major developments to detail how they will provide infrastructure facilitating recycling and composting on site?

Response	Count
Agree / Yes	10
Disagree / No	4
No View Expressed	167
<b>Total</b>	<b>181</b>

Responses were received from the following respondents: 3, 8, 17, 19, 22, 24, 54, 57, 58, 92, 94, 120, 168, 181

### Summary of Responses

There were limited comments made for this question. The responses which were received are summarised below:

- Question raised over how the council defines “major development”. If this alludes to the NPPF definition of 10 or more homes / area 0.5 hectares or more, the respondent considered a requirement to provide recycling and composting processing on site unpractical. It was further suggested that such considerations should only be determined at the application / reserved matters stages.
- Viewed as impractical with the suggestion that greater support should be given to recycling centres and use of composting for biogas energy generation, which would be more sustainable.
- It is not always possible to provide the information on how waste generated by new development proposals will be managed as part of the planning application submission. Therefore, there should be flexibility for such requirements to be secured via a suitable worded proposal. It was further suggested that any condition should allow development works to commence and request details of waste management to be provided prior to properties being occupied.

## Stafford Borough Council Response

Stafford Borough Council notes the comments made.

**10.Cb) Should the Council require developers to submit a strategy for how they will dispose of waste in a sustainable manner throughout the construction phase of development?**

<b>Response</b>	<b>Count</b>
Agree / Yes	8
Disagree / No	3
Other Comments	1
No View Expressed	169
<b>Total</b>	<b>181</b>

**Responses were received from the following respondents:** 3, 8, 22, 24, 29, 54, 57, 58, 92, 94, 120, 168

**Summary of Responses**

Few responses were received in respect of this question. The responses that were received are summarised below:

- The view that this should only be applied to medium sized developments, i.e. above 12 dwellings, so as to not negatively impact the economic viability of small rural development sites.
- That this is already required through provision of a construction management plan at the planning application stage.
- Details of the management of waste during the construction phase is typically set out in a Construction Environmental Management Plan (CEMP). Requiring submission of a CEMP can be secured via a suitable worded condition on any planning permission. Therefore, any future policy requiring submission of a CEMP, where necessary and appropriate, should ensure there is flexibility for this to be provided post-decision.

**Stafford Borough Council Response**

Stafford Borough Council notes the comments made.

**10.Cc) Should the Council employ any further measures to increase the sustainable and efficient disposal of waste in Stafford borough?**

There were a total of 8 responses to this question, with 7 in support and 1 against.

**Responses were received from the following respondents:** 3, 8, 22, 24, 54, 92, 120, 168

**Summary of Responses**

Few responses were received in respect of this question. The responses that were received are summarised below:

- Further measures must include policies that encourage manufactures, suppliers and retailers to reduce the amount of packaging they use and move to recyclable and degradable packaging.
- This requires a commitment not to neglect local recycling sites. This is very important but difficult to achieve via the planning process.

### **Stafford Borough Council Response**

Stafford Borough Council notes the comments made.

## **Section 11 – Health and Well-being**

### **11.Aa) Should the New Local Plan 2020 - 2040 continue to address health and well-being via relevant associated policies in the way currently adopted plan does?**

There were a total of 10 responses to this question, with 3 in support, 6 against and 1 providing a neutral comment.

**Responses were received from the following respondents:** 3, 8, 17, 24, 37, 54, 87, 92, 94, 174

#### **Summary of Responses**

Few responses were received in respect of this question. The responses that were received are summarised below:

- Health and well-being are becoming increasingly important, in line with the new Royal Horticultural Society's (RHS's) push for green areas being beneficial to health, this should be reflected in the new plan.
- One respondent does not consider there is the need for any additional policies to be introduced into the local plan in connection to Health and Well-being as they consider the current standards far exceed what is necessary.
- One respondent felt it would be helpful to developers for there to be some guidance on these potential requirements and policies, and for these to be clearly set out. Having adopted policies which cover these points would assist in giving clarity as to what would be expected. In addition, there should be some degree of flexibility and the requirements are not onerous.

#### **Stafford Borough Council Response**

Stafford Borough Council notes the comments made.

### **11.Ab) Or should an alternative approach to the integration of health and well-being issues into the New Local Plan be adopted?**

There were a total of 8 responses to this question, with 4 in support, 2 against and 2 responses providing "Other Comments".

**Responses were received from the following respondents:** 8, 24, 37, 54, 92, 93, 119, 174

#### **Summary of Responses**

Few responses were received in respect of this question. The responses that were received are summarised as follows:

- It was noted by one respondent that the adopted Stafford local plan does not have a policy on health and well-being however the general expectations of the 2019 NPPF is that planning will promote healthy communities. The NPPF confirms that a Health Impact Assessment (HIA) can serve a useful purpose at the planning application stage and consultation with the Director of Public Health as part of the process can establish whether a HIA would be a useful tool for understanding the potential impacts upon well-being that development proposals will have on existing health services and facilities.
- However, some concern was expressed that if the council adopts an alternative approach to the adopted local plan, any requirement for a HIA Screening Report and / or a full HIA should be based on a proportionate level of detail in relation to the scale and type of development proposed. The requirement for HIA Screening Report without any specific evidence that an individual scheme is likely to have a significant impact upon the health and well-being of the local population is not justified by reference to the NPPF. Only if a significant adverse impact on health and well-being is identified should a full HIA be required, which sets out measures to substantially mitigate the impact.

### **Stafford Borough Council Response**

Stafford Borough Council notes the comments made.

### **11.Ac) Where should references to Health and Well-being be strengthened in the New Local Plan?**

A total of 13 respondents made representations in respect of this issue.

**Responses were received from the following respondents:** 3, 7, 8, 22, 24, 31, 33, 37, 38, 39, 92, 119, 162

### **Summary of Responses**

- The majority of comments received considered that the treatment of “Health and well-being” in the local plan should be strengthened but there were arguments made for both dedicated policies and inter-weaving these with other themes within the document.
- There was some limited support for a separate overarching policy which would ensure a clear focus on the issue.
- However, there appeared to be greater support for the inter-weaving approach which would recognise this cross-cutting theme across all aspects of the Plan.
- One respondent was unsure whether a local plan is the right place to address Health and Well-being issues, but if it is, the proposals should be specific such as:
  - All homes to be lifetime homes.



- All hedgerows affected by development to have species recorded and preserved.
- All mature trees to be preserved unless demonstrably unsafe.
- Sport England welcomed reference to Active Design Guidance within the current local plan which should also be incorporated within the new local plan.

The areas considered most appropriate for the interweaving approach were:

- The housing section as the current focus on housing supply is on numbers and areas, not on types of housing which can enable independent living such as bungalows.
- Several responses felt the natural environment chapter has the opportunity for stronger references to health and well-being. It was argued that preserving, protecting and improving the natural environment near people's homes and in the wider countryside, and creating new greenspace, will provide health and well-being benefits and reduce social inequalities in the local communities it supports. This would correspond to and reinforce the 25-year Environment Plan target for *"making sure that there is high quality, accessible, natural spaces close to where people live and work, particularly in urban areas, and encouraging more people to spend time in them to benefit their health and well-being"*.
- Further, it was suggested that the Plan must reflect the importance of nature-based solutions and green infrastructure in improving health and well-being and preventing negative impacts on health from other sources such as air pollution, climate change and even road safety. The local plan should recognise, and help deliver, the benefits that access to nature has for health and well-being. For example, green spaces, green roofs and walls, safe green access routes, communal areas to garden and grow produce, and opportunities for people to congregate and reduce social isolation. Developments need to be permeable with green infrastructure and nature corridors so that people can benefit in terms of both mental and physical health. Play areas should include places and features for natural play, as well as formal play provision.
- In terms of transport, the plan should facilitate safer footpaths and cycle paths to encourage an increased level of day-to-day exercise. It was further commented that Stafford is a flattish borough but has high volumes of HGV traffic which makes the roads unsafe for pedestrians (as many rural roads do not have footpaths) and cyclists.
- Additionally, it was suggested that the canal network within the borough can play a valuable role in encouraging people to be more active, providing communities with an accessible green space, offering opportunity for supporting and promoting healthier lifestyles and helping to improve the physical and mental well-being. This could come from leisure and recreation, including activities such as canoeing, walking or cycling, or offering a more

active travelling option that is a sustainable alternative to using private motor cars to access services and facilities. It was argued that the Plan should acknowledge this and support measures to promote use of the canal network as a resource for the whole community to use.

### **Stafford Borough Council Response**

Stafford Borough Council notes the views expressed and will present its proposed approach in the Preferred Option.

### **11.B) If at Question 11.Ab you considered that the Council should adopt an alternative approach to the integration into the New Local Plan, which model listed in Para 11.10 would you advocate?**

There were a total of 5 responses to this question, 2 in support of model A, 1 in support of model B, 1 who felt model B and C were identical and 1 who did not choose a model but provided a comment.

**Responses were received from the following respondents: 3, 8, 22, 24, 174**

### **Summary of Responses**

There were very few responses to this question. One of the respondents who was in support of model A expressed the following view:

- The local plan needs to have regulations that address health and well-being throughout the plan with there being over-arching principles and requirements that are adapted into each assessment. They also suggested that a negative consequence of impact assessments was that it could lead to developers having grounds to argue against requirements and to attempt to reduce the measures.

In addition, the other respondents raised specific issues which were:

- The suggestion that all development over 50 houses should do a full Health and Well-being assessment to the effect that this should show the impact on existing settlements.
- Seek to gain control of the number and location of A5 fast food outlets which was considered particularly relevant to the protection of children and vulnerable adults.
- Exclusion zones around schools were seen as a good idea.
- HIAs are to be desired.
- The role of planning for areas that are currently deprived require policy directed towards urgent action.
- The suggestion that Health and Well-being should be granted equal priority to Climate and Environment.

- Health and well-being is not an add-on, but a basis underpinning of a healthy society.

### **Stafford Borough Council Response**

Stafford Borough Council notes the views expressed and will present its proposed approach in the Preferred Option.

## Section 12 – Connections

**12.A) Do you agree with the general approach to delivering sustainable transport for Stafford borough through the new Local Plan? If not, please give a reason for your response**

Response	Count
Agree / Yes	16
Disagree / No	9
Other Comments	10
No View Expressed	146
<b>Total</b>	<b>181</b>

**Responses were received from the following respondents:** 2, 3, 4, 5, 7, 8, 9, 10, 11, 14, 17, 22, 24, 27, 28, 29, 30, 33, 37, 40, 54, 57, 58, 61, 77, 81, 86, 92, 110, 118, 122, 162, 168, 170, 174

### Summary of Responses

There were a number of comments which covered a wide variety of themes, with there being five primary areas of discussion. These areas were: public transport, cycling and walking, the decarbonisation of personal motorised transport, sustainability and the environment, and specific comments in relation to the proposed Garden Community. Comments for these areas are summarised in the following section, with the general comments relating to the question being presented first.

The general comments received have been summarised as follows:

- There was a broad consensus that the proposed approach to delivering sustainable transport for Stafford Borough through the local plan was heading in the right direction but that it did not go far enough either in terms of intent or detail and that more positive action should be taken in the future to meet the stated aims rather than the current approach.
- It was suggested that this lack of clear ability to robustly apply these principles to developments means that they come across as having a fairly low ambition in the long term and will not genuinely serve to deliver the low carbon future which the borough so desperately needs.
- Further, it was observed that the council's ambitions in this respect will only have effect if it pursues a spatial strategy and policy regime that gives it the very best chance of delivering sustainable outcomes. Building large numbers of new homes in remote locations that are not and cannot be well connected to higher order centres by public transport will render the council's words on transport meaningless. It was welcomed that the council recognises the issues relating to the access of public transport by rural residents, but concern

was expressed that there was no hint as to how the commendable aspiration expressed could begin to be achieved.

- Concern was expressed in respect of the state and perceived inadequacy of the road system especially in the rural areas.
- Developers broadly supported the general approach set out and the delivery of sustainable transport solutions. These can be made more viable and delivered through contributions from development, which provides benefit to incoming residents to those developments, and for existing residents of the settlements concerned. However, further comments were withheld until further detail is made available later in the process, in particular consultation on the Integrated Transport Strategy.
- Hixon Parish Council suggested that in their case, and by extension elsewhere, the linkage between the provision of employment opportunities alongside new housing and the basis that it will reduce the need to travel is a falsehood since, in Hixon, 90% of Hixon residents who travelled to a place of work / education travelled out of Hixon. By contrast, 90% of employees at the three local industrial estates lived outside of Hixon. Almost all used private car or van to travel to work because there is no viable public transport. This is only addressed by the provision of suitable jobs for those residents.
- One respondent suggested that any transport strategy needs to consult with user groups as well as the bodies mentioned, e.g. civic societies and amenity groups, U3A, Sustainability Matters, cyclists, Ramblers.
- It was accepted that the electrical infrastructure should be upgraded to support personal electrical vehicles in rural areas, with some comments made that the design of new housing and employment schemes should take the charging needs of electric vehicles into account.
- It was suggested that the transport policies should take full account of the impacts on the natural environment through the Sustainability Appraisal (SA) and Habitat Regulations Assessment (HRA) process. Links could be made with policies on Green Infrastructure and ecological networks e.g. contribution of highway verges and railway embankments.

The following section covers the comments received in relation to the five areas of discussion. Within these sets of comments, the associated infrastructure requirements and how development should fund these figured quite prominently. In addition, there were several responses from a number of statutory agencies and service / infrastructure providers.

Statutory agencies and infrastructure providers:

- Highways England highlighted that their interests are centred around M6 Junctions 14 and 15, which are located within the Plan area. It was noted by them that in all scenarios, at least 50% of dwellings and 30% of employment land is proposed to be located in the Stafford area. Highways England further

stated that, as M6 Junction 14 lies to the north of the area, any development in this area should consider its expected impact on the continued safe operation of the junction by way of submission of a Transport Assessment, or if not significant a Transport Statement at planning stage. In addition, Highways England welcomed all efforts to consult with them in the pre-application stage of developments in order to address these issues at the earliest possible stage and asked that Stafford Borough Council considers the Strategic Road Network when making any allocation decisions.

- Staffordshire County Council highlighted that an appraisal of sustainable transport accessibility is required in order to determine the preferred option in transport terms. In addition, traffic modelling of the preferred option will be required to identify likely highway mitigation required to accommodate residual traffic generation. The County Council stated that they will support the borough council with these appraisals, which will provide the evidence for identifying the package of measures required to ensure acceptability in transport terms. The Integrated Transport Strategy will be updated accordingly.
- The County Council further highlighted that the eight Integrated Transport Strategies, one for each District, include current policies, strategies and proposals for Staffordshire and have now replaced the 2011 Local Transport Plan. The Local Transport Plan 2011 is outdated and there is no plan to revise the document. It is therefore recommended that reference to the Staffordshire Local Transport Plan in paragraph 12.1 is removed.
- HS2 confirmed that current plans are for HS2 services to utilise the existing station's facilities and there is no operational requirement for, or commitment on HS2 Ltd to provide an integrated station in Stafford Town. HS2 Ltd supports the council in its proposals to capture and build upon the benefits resulting from the provision of additional capacity and improved connectivity that HS2 services will bring to Stafford within the plan-period. To this end, HS2 Ltd could provide technical support to the council in terms of its plans for an integrated station in Stafford and, if appropriate, the Stafford Gateway proposal.
- Network Rail highlighted that any proposed development which is in close proximity to the railway line or could potentially affect Network Rail's specific land interests will need to be carefully considered. In terms of making a local plan allocation the effect of increased patronage at local stations from the housing must be considered. Therefore section 106 or CIL funding would need to be allocated for station improvements.

#### Public transport:

- Quite a high proportion of the responses to this section related to the provision of public transport, both rail and buses.

- It was suggested that new housing and employment should be required to be designed for, and served by, public transport with the need for remedial work to try to redress this omission on the large developments which have taken place in the last nine years.
- Further, it was commented that businesses based in rural areas and particularly those clustered on rural business parks, are continually finding it a challenge to recruit and retain staff, with it being stated that regular and reliable public transport is key to addressing some of these challenges.
- Similarly, it was suggested that greater emphasis is placed on increasing access to sustainable transport, particularly a greater number of public transport links, within the borough's smaller settlements. This will improve the sustainability of the settlements and provide greater opportunity for their sustainable expansion.
- A number of these responses highlighted the reduction of public transport availability, especially buses in rural areas but also the main towns of Stone and Eccleshall, with a minority advocating the renationalisation of local buses although it was recognised that this was outside the scope of the local plan.
- Buses were recognised as having an important role to play but are not perceived as attractive and are often a last resort. Conversely trains are much more popular than buses, even for local journeys. It was suggested that people are not prepared to give up their cars for buses but that trains are perceived as something different, i.e. something that complements cars rather than competes with them.
- There were strong suggestions that the rail services across the borough should be enhanced, with some lines / station being reopened, in order to provide a greater range of sustainable transport options within and beyond the area. These included:
  - The re-opening of Norton Bridge station, Hixon and other stations along the Trent Valley line (Colwich, Great Haywood, Weston, Sandon and the east platforms at Stone) to enable local trips to feed into longer journeys.
  - Reopen the Stafford to Wellington line as a key missing link with stations at Haughton and Gnosall.
  - Reopen the Stafford to Uttoxeter line
- It was accepted that such re-openings would not be easy or cheap but with their potential benefit it was argued that in order to achieve a more sustainable public transport system these should be considered. Commitment from Stafford Borough Council, even if initially just in principle, would demonstrate a bold and progressive attitude.

#### Cycling and walking:

- Sport England advocated that the Plan should support the prioritisation of active travel through safe, integrated walking and cycling routes.

- For local journeys and recreation, footpaths and walking routes around Hixon seem to be quite well developed and marked, and enjoyable. Hopefully this will continue. However, the enhancement or creation of cycling paths would be very welcome.
- The suggestion that walking and cycling provision in Stone should be improved

#### Garden Communities:

- It was suggested that if the proposed Garden Community is sited at Meecebrook, it would benefit from excellent connectivity to the M6 Motorway at Junctions 14 and 15 and would be linked to Stafford by road which is less than 20 minutes drive time. The road network is already utilised by existing bus services connecting Yarnfield and Eccleshall, and the surrounding rural communities with Stafford, Stone and the Potteries conurbation. It would be suggested that these services would have the potential of being significantly enhanced as a consequence of locating the New Garden Settlement at Meecebrook.
- Further, if sited at Meecebrook, the West Coast Mainline runs through the site with investigative work underway to determine whether it is feasible and viable to create a new set down station on the West Coast Mainline within or near to the Garden Settlement. Whilst neither the delivery nor the sustainability of the New Garden Settlement is contingent upon a new railway station here, if delivery of a new station here is secured, then the site would be regarded as being highly sustainable due to its transport connectivity.

#### Stafford Borough Council Response

Stafford Borough Council notes the views expressed and will present its proposed approach in the Preferred Option.

#### 12.Ba) Do you agree with the approach to widening the choice of transport solutions through large scale development in key locations across Stafford borough, related to the existing networks?

Response	Count
Agree / Yes	9
Disagree / No	5
Neutral / Other Comments	4
No View Expressed	163
<b>Total</b>	<b>181</b>

**Responses were received from the following respondents:** 3, 17, 22, 27, 29, 30, 34, 39, 54, 57, 58, 61, 81, 92, 106, 115, 119, 168



## Summary of Responses

Responses received to this question were broadly supportive of the principle of using large scale new development to improve the choice of transport solutions. A number of detailed comments were made. These included:

- That transport solutions will need to be discussed and agreed with the applicant during the pre-application process.
- Through an increased critical mass of users for new routes and developer contributions likely associated with new development, high quality walking and cycling routes can be developed which serve new development, connecting them to existing developments, and allowing new and existing residents to benefit from improved facilities.
- Concerns expressed about the perceived lack of capacity of the current transport infrastructure and the risks to it posed by new development. A number of calls for substantial road improvements and a park and ride were made.
- An assertion that large-scale developments generally increase the use of cars and service vehicles, and are seldom tightly integrated with public transport infrastructure, even where such exists. Concern was expressed that a new 'garden village' in a rural location would rely almost entirely on road connections and contribute to increased carbon emissions.
- That smaller sites in sustainable locations can also contribute to widening the choice of transport solutions. For example, by connecting into and expanding existing pedestrian and cycle facilities which provide access to nearby services and facilities or enhancing and maintaining the vitality and viability of existing public transport services. It was further requested that this was recognised in any relevant local planning policy.
- An observation of the possibility of development opportunities within rural areas and that development in these areas can also contribute to a more diverse range of transport options. Rural locations should simply have a different mix of public and active transport links in their planning and developments considered, and the provision of local essential services, e.g. schools, health care and basic grocery shopping, to mitigate the need for high levels of travel.
- Developers with specific land interests suggested that their proposals would provide appropriate opportunities to expand and enhance public transport links in the Stafford town and across the borough benefiting new and existing residents.
- An additional comment made was that any strategy for transport infrastructure in Stafford borough should consider the impact on the significance of the historic environment, heritage assets and their setting.
- Advice from Staffordshire County Council in their role as transport authority included:

- That an initial traffic appraisal using the existing SATURN traffic model has been completed by Atkins consultants to consider the likely impact of a further 1,500 new homes in the south, east or north of Stafford and 25 hectares of employment in either the east or north, between 2031 and 2040. It concludes that growth in the north will have the least impact on the overall performance of the highway network, mainly due to the proximity to the M6. All growth scenarios will require significant improvements in sustainable transport within the local plan period to 2040.
- The recognition of Local Cycling and Walking Infrastructure Plans (LCWIP) in paragraph 12.1 is supported, as advised in paragraph 104 of NPPF which states that planning policies should draw on Local Cycling and Walking Infrastructure Plans. Staffordshire County Council's LCWIP was submitted to the Department for Transport on 19th February 2020 and builds on the council's delivery of previous sustainable transport projects. It takes a comprehensive network approach and targets the areas where there is the greatest demand and the largest potential for the transfer of short journeys to walking or cycling.
- This is an ideal way to integrate the Green and Blue Infrastructure (GBI) plan throughout the borough, with the emphasis on Active Travel and healthy living, as well as taking advantage of the readymade canal, river and natural environment corridors. Health and well-being once again relates well to a GBI plan by integrating open space planning and linking to existing and new corridors connecting places and communities.
- There is very limited information within the plan regarding the public rights of way network, which is understandable at this stage, but welcome the desire to improve accessibility on the walking and cycling networks throughout the borough. The desire to increase the levels of physical activity is also welcomed and the public rights of way network should be integral to any schemes that are developed to promote this. The Rights of Way team would be happy to provide advice and work together on any schemes which benefit residents through improvements to the path network. As the Plan progresses and sites are allocated the borough council should also consider inclusion within policies for improvements to the existing path network where applicable and possible in line with Staffordshire County Council's Rights of Way Improvement Plan. This could include:
  - The creation of public bridleways or the upgrading of public footpaths to bridleways to improve provision for horse riders and cyclists.

- The creation and promotion of short circular walks to promote the health benefits of walking.
- The replacement of stiles with gaps (where there are no stock) or gates (where there are) in line with Staffordshire County Council's Least Restrictive Principle for path furniture.

### **Stafford Borough Council Response**

Stafford Borough Council notes the views expressed and will present its proposed approach in the Preferred Option.

### **12.Bb) How do you consider that high quality walking and cycling networks can be developed through new development?**

A total of 16 respondents made representations in respect of this issue.

**Responses were received from the following respondents:** 3, 22, 24, 27, 28, 31, 39, 54, 57, 58, 92, 106, 110, 119, 168, 177

### **Summary of Responses**

A total of 16 responses were for this question. A variety of issues were covered by the comments including:

- The need for maintenance of the existing walking and cycling network, as well as any new provision, to make the use of such facilities attractive and safe.
- Where possible the walking and cycling network should be separated from roads.
- That the walking and cycling network should cover the entirety of the borough and not be focussed on the main towns and / or the existing network of footpaths and bridleways.
- The network should be developed across the key transport corridors within the towns and take people to and from where they need to get to, quickly, safely and easily.
- New walking and cycling facilities should link into the existing network.
- The need for new walking and cycling facilities in the urban areas to, for example, serve Stafford Railway Station and for these infrastructures to be able to cross major roads and other infrastructure, e.g. the Western Access Road and West Coast Main Line.
- The need for the development of high-quality walking and cycling facilities to be funded via developer contributions in the local area.
- Through an increased critical mass of users for new routes and developer contributions likely associated with new development, high quality walking and cycling routes can be developed which serve new development, connecting them to existing developments and allowing new and existing residents to benefit from improved facilities.

- Development of walking and cycle networks could provide an alternative method to travel to work and education, other than the car, with the inherent gains in health and well-being.
- The role of canal towpaths in forming an integral element of the walking and cycling network to serve existing and potential future development. Where new developments are located nearby to the canal system, these developments should be linked to existing, or where necessary, new access points to the canal towpath. Such provision would require a contribution by developers to the installation and subsequent maintenance of such access and the towpaths they serve.

### **Stafford Borough Council Response**

Stafford Borough Council notes the views expressed and will present its proposed approach in the Preferred Option.

### **12.Ca) Is there an issue with overnight lorry parking at certain locations within Stafford borough? If so, where?**

There were a total of 3 responses to this question.

**Responses were received from the following respondents: 3, 22, 29**

### **Summary of Responses**

Three locations where overnight lorry parking issues were cited. These were:

- Moreton
- Gnosall
- Crab Lane, Stafford

It was also suggested whether the borough's industrial estates could have some parking provision.

Staffordshire County Council (SCC) commented that their Freight Strategy includes a specific section on this issue and should form part of the evidence base. SCC also made the following comments:

- SCC receives numerous requests for additional overnight HGV parking and concerns over the lack of available facilities for drivers.
- Demand for lorry parking facilities in Staffordshire is increasing with the advent of new working directives limiting driver hours and increased long distance haulage.
- The main overnight facility in Stafford closed for construction of the Western Access Road leaving the area with a shortage of overnight facilities.
- There is a need for shorter duration layby type facilities and longer stay overnight waiting areas for drivers which has been reiterated by drivers.

- With a lack of secure overnight facilities theft from road freight is becoming an increasingly important issue.
- It is a significant challenge both publicly and privately to provide adequate and well-located facilities for HGVs. Environment and cost factors are also involved.
- Department for Transport (DfT) National Survey of Lorry Parking found that there was a critical lack of facilities in the West Midlands region with an increase in spaces of 21% required.
- The issue of HGV parking is region-wide but in specific regard to Stafford borough the reduction in capacity in Stafford itself is an issue especially with new and proposed expansion of employment and commercial areas.
- HGV parking areas should be located close to main trunk roads and relevant delivery / collection locations. Many existing employment areas suffer from inappropriate, poorly equipped overnight HGV parking and would be likely to benefit from designated facilities for HGVs both for short and longer stay.

### **Stafford Borough Council Response**

Stafford Borough Council notes the views expressed and will present its proposed approach in the Preferred Option.

### **12.Cb) Is it appropriate to make provision for new overnight lorry parking at existing employment locations where new development will take place? If not, please provide a reason for your response**

There were a total of 3 responses to this question.

**Responses were received from the following respondents: 3, 22, 92**

### **Summary of Responses**

There were limited responses to this question, with the only comments being:

- The provision of overnight lorry parking would reduce pressure on “fly parking” especially in rural areas.
- Another respondent suggested that new / wider roads were a higher priority.

### **Stafford Borough Council Response**

Stafford Borough Council notes the comments expressed.

**12.Da) Do you consider it is necessary to set local parking standards for residential and non-residential development?**

**12.Db) If so, should a similar approach of minimum standards be used for new developments across Stafford borough or should maximum parking standards be identified for Stafford town centre area?**

There were a total of 15 responses for the two questions.

**Responses were received from the following respondents:** 3, 22, 24, 40, 54, 57, 58, 81, 87, 93, 94, 104, 106, 110, 162

### **Summary of Responses**

The majority of responses were supportive of the parking standards principle for residential and non-residential developments, however the detail was viewed as critical in terms of making this approach work in practice. Key points related to:

- The need for flexibility within policy to accommodate different contexts, e.g. town, semi-rural, nature of development etc., which will suggest the need for different levels of provision.
- The suggestion that parking standards should be individually negotiated at development scheme level and considered on a site-by-site basis.
- Any standards should be flexible and allow opportunities for departures to reflect the local context and site-specific opportunities and constraints. This will enable matters such as proximity of public transport facilities and local services/facilities to be taken into account.
- The assertion that the council should recognise that residents will have at least one car.
- That the setting of local car parking standards should accord with the 2019 NPPF (paras 105 and 106). It is not necessary for the council to specify provision of Electric Vehicle Charging Points (EVCPs) because of the government's proposed changes to Building Regulations.
- The view that an attempt to limit car ownership and use by restricting parking on estates and in town centres is doomed to failure and that effort should be expended to increase investment in public transport, shared ownership schemes and the like if traffic is not to increase in line with dwelling and population increase. A minimum standard of at least one off-road place per new dwelling plus on street parking for carers and visitors.
- Paragraph 106 of the NPPF was cited. This states that maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in the city and town centres and other locations that are well served by public transport. It was suggested that if the council is minded to adopt maximum

parking standards for Stafford town centre it should provide evidence to demonstrate clear and compelling justification in accordance with the requirements of the NPPF.

### **Stafford Borough Council Response**

Stafford Borough Council notes the views expressed and will present its proposed approach in the Preferred Option.

### **12.E) Do you consider that a new policy setting out the approach to new electronic communication infrastructure, its extent and location is required for Stafford borough?**

There were a total of 10 responses to this question.

**Responses were received from the following respondents:** 3, 17, 22, 24, 27, 28, 54, 93, 119, 162

### **Summary of Responses**

From the responses to this question, there was strong support for the principle expressed in relation to the need for the improvement of the electronic communications infrastructure. The key points are summarised below:

- One response stated that the council should not impose new electronic communications requirements beyond the provision of infrastructure as set out in statutory Building Regulations.
- A number of comments made asked that the council accelerated the provision of electronic communications infrastructure so that the government targets in this respect are met.
- The policy recognition that electronic communications have the ability to remove, for some workers, the need to travel to work for at least some of the time and therefore contribute to carbon neutrality.
- The need for policy to consider this technology as “essential infrastructure” on a par with water, gas and electricity.
- The desire that the technology should be driven by a “need” basis, rather than the market, and developments need to have quality internet connectivity built into their requirements from the earlier planning stages in order to ensure they are future proof. This can be spread across both the latest generations of mobile internet technology, as well as fibre connectivity, but the important thing is that there are no “not-spots” in our borough.
- That providers should provide Fibre To The Premises (FTTP) rather than to the nearest exchange box to enable the full benefits of fibre for residents and businesses to be accrued.
- The Covid-19 pandemic has forced a revolution in terms of what is seen as “the workplace”. Reliable broadband connectivity is key, particularly in some

of the borough's rural communities, where poor connectivity is seen as the norm.

**Stafford Borough Council Response**

Stafford Borough Council notes the views expressed and will present its proposed approach in the Preferred Option.