

**Stafford Borough
Local Plan 2020 - 2040:
Preferred Options
Responses**

**Agents, Developers and
Landowners - Part 6**

Consultation Period: 24 October - 12 December 2022

Published: February 2023

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From: Preferred Options Consultation [REDACTED]
Sent: 12 December 2022 08:39
To: Strategic Planning Consultations
Subject: Preferred Options Consultation - Submitted Response

Full name: **Stafford Station Gateway Delivery Partners**

Email: [REDACTED]

Agents and Developers

Organisation or Company: **Stafford Borough Council, Staffordshire County Council, London and Continental Railways**

Age: **Prefer not to say / not applicable**

Added to database: [REDACTED]

Topics (Contents page): **No reply**

Vision and Objectives

Q1 - Which 3 are most important to you? **No reply**

Development Strategy and Climate Change

Q2 - Do you agree with each of the policies in this chapter?

Policy 1 (Development Strategy): **No reply**

Comments: **No reply**

Policy 2 (Settlement Hierarchy): **No reply**

Comments: **No reply**

Policy 3 (Development in open countryside): **No reply**

Comments: **No reply**

Policy 4 (Climate change and development requirements): **No reply**

Comments: **No reply**

Policy 5 (Green Belt): **No reply**

Comments: **No reply**

Policy 6 (Neighbourhood plans): **No reply**

Comments: **No reply**

Meecebrook Garden Community

Q3 - Do you agree with proposed new garden community: **No reply**

Comments: **No reply**

Site Allocation Policies

Q4 - Do you agree with the proposed allocations?

Policy 9 (North of Stafford): **No reply**

Comments: **No reply**

Policy 10 (West of Stafford): **No reply**

Comments: **No reply**

Policy 11 (Stafford Station Gateway): **No reply**

Comments: **No reply**

Policy 12 (Other housing and employment land): **No reply**

Comments: **No reply**

Site Allocation Policies (continued)

Q5 - Do you agree with the proposed allocations?

Policy 13 (Local Green Space): **No reply**

Comments: **No reply**

Policy 14 (Penk and Sow): **No reply**

Comments: **No reply**

Policy 15 (Stone Countryside): **No reply**

Comments: **No reply**

Economy Policies

Q6 - The local plan seeks to protect previously allocated and designated industrial land and support home working and small-scale employment uses. Do you agree: **No reply**

Comments: No reply

Q7 - The Stafford Borough Plan proposes policies around the town centres uses, agriculture and forestry development, tourism development and canals. Do you agree? **No reply**

Comments: **No reply**

Housing Policies

Q8 - The local plan proposed a policy (23) on affordable housing. Do you agree? **No reply**

Comments: **No reply**

Q9 - The local plan proposes a policy (30) to help meet identified local need for pitches for Gypsies and Travellers. Do you agree? **No reply**

Comments: **No reply**

Q10 - The local plan proposes policies around homes for life, rural exception sites, new rural dwellings, replacement dwellings, extension etc. Do you agree? **No reply**

Comments: **No reply**

Design and Infrastructure Policies

Q11 - Do you agree with policies? **No reply**

Comments: **No reply**

Environment Policies

Q12 - Do you agree with policies? **No reply**

Comments: **No reply**

Connections

Q13 - Do you agree with policies? **No reply**

Comments: **No reply**

Evidence Base

Q14 - Have we considered all relevant studies and reports? **No reply**

Comments: **No reply**

Q15 - Do you think there is any further evidence required? **No reply**

Comments: **No reply**

General Comments:

The Strategic Regeneration Framework that supports delivery of the Stafford Station Gateway scheme was subject to a six week public consultation exercise that closed in

September. The Delivery Partners are considering the feedback to the consultation and would therefore welcome the opportunity to share and discuss the revised Strategic Regeneration Framework in the New Year.

From: James Bonner [REDACTED]
Sent: 12 December 2022 11:45
To: Strategic Planning
Subject: Stafford Local Plan Review - Magnor Plant, Cold Meece
Attachments: 221212 Morgan Sindall Stafford Preferred Options Reps.pdf

Good morning,

We have responded using the online forms on behalf of our client's land interests at the Magnor Plant, Cold Meece. Please also find attached our letter. We would be happy to discuss this with you at your convenience. Thank you.

Kind regards,

James Bonner
Planning Associate Director



[REDACTED]

bartonwillmore.co.uk

[REDACTED]



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From: Preferred Options Consultation [REDACTED]
Sent: 12 December 2022 11:33
To: Strategic Planning Consultations
Subject: Preferred Options Consultation - Submitted Response

Full name: **James Bonner**

Email: [REDACTED]

Agents and Developers

Organisation or Company: **Morgan Sindall (in respect of Magnor Plant)**

Age: **Prefer not to say / not applicable**

Added to database: [REDACTED]

Topics (Contents page): **Meecebrook Garden Community**

Vision and Objectives

Q1 - Which 3 are most important to you? **Not asked**

Development Strategy and Climate Change

Q2 - Do you agree with each of the policies in this chapter?

Policy 1 (Development Strategy): **Not asked**

Comments: **Not asked**

Policy 2 (Settlement Hierarchy): **Not asked**

Comments: **Not asked**

Policy 3 (Development in open countryside): **Not asked**

Comments: **Not asked**

Policy 4 (Climate change and development requirements): **Not asked**

Comments: **Not asked**

Policy 5 (Green Belt): **Not asked**

Comments: **Not asked**

Policy 6 (Neighbourhood plans): **Not asked**

Comments: **Not asked**

Meecebrook Garden Community

Q3 - Do you agree with proposed new garden community: **Yes**

Comments: **We agree with the new settlement but our client's land (which is within the allocation) should be identified for a specific land use. It is an ideal location for an early phase of development as it is already served from Swynnerton Road. It will form a key gateway around the Meece Brook corridor, a highly attractive and accessible location in terms of the wider settlement and public transport. It could deliver in accordance with the parameters and principles that will be set out in the Framework Masterplan Supplementary Planning Document.**

Site Allocation Policies

Q4 - Do you agree with the proposed allocations?

Policy 9 (North of Stafford): **No reply**

Comments: **No reply**

Policy 10 (West of Stafford): **No reply**

Comments: **No reply**

Policy 11 (Stafford Station Gateway): **No reply**

Comments: **No reply**

Policy 12 (Other housing and employment land): **No reply**

Comments: **No reply**

Site Allocation Policies (continued)

Q5 - Do you agree with the proposed allocations?

Policy 13 (Local Green Space): **No reply**

Comments: **No reply**

Policy 14 (Penk and Sow): **No reply**

Comments: **No reply**

Policy 15 (Stone Countryside): **No reply**

Comments: **No reply**

Economy Policies

Q6 - The local plan seeks to protect previously allocated and designated industrial land and support home working and small-scale employment uses. Do you agree? **No reply**

Comments: No reply

Q7 - The Stafford Borough Plan proposes policies around the town centres uses, agriculture and forestry development, tourism development and canals. Do you agree? **No reply**

Comments: **No reply**

Housing Policies

Q8 - The local plan proposed a policy (23) on affordable housing. Do you agree? **No reply**

Comments: **No reply**

Q9 - The local plan proposes a policy (30) to help meet identified local need for pitches for Gypsies and Travellers. Do you agree? **No reply**

Comments: **No reply**

Q10 - The local plan proposes policies around homes for life, rural exception sites, new rural dwellings, replacement dwellings, extension etc. Do you agree? **No reply**

Comments: **No reply**

Design and Infrastructure Policies

Q11 - Do you agree with policies? **No reply**

Comments: **No reply**

Environment Policies

Q12 - Do you agree with policies? **No reply**

Comments: **No reply**

Connections

Q13 - Do you agree with policies? **No reply**

Comments: **No reply**

Evidence Base

Q14 - Have we considered all relevant studies and reports? **Yes**

Comments: **No reply**

Q15 - Do you think there is any further evidence required? **No**

Comments: **No reply**

General Comments:

Please see our covering letter.

BIRMINGHAM
BRISTOL
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SOUTHAMPTON

**BARTON
WILLMORE** now  **Stantec**



Strategic Planning & Place
Stafford Borough Council
Civic Centre
Riverside
Stafford
ST16 3AQ

BY EMAIL

28854/A3/JB/bc

12th December 2022

Dear Sir/Madam

REPRESENTATIONS TO STAFFORD BOROUGH COUNCIL LOCAL PLAN REVIEW - PREFERRED OPTIONS CONSULTATION

SUBMITTED ON BEHALF OF MORGAN SINDALL CONSTRUCTION & INFRASTRUCTURE LTD

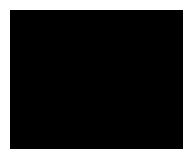
Thank you for the opportunity to respond on your Preferred Options consultation for the Stafford Borough Council Local Plan Review (the 'draft Plan'). We make these representations on behalf of our Client, Morgan Sindall Construction & Infrastructure Ltd, in respect of its land at the Magnor Plant depot in Cold Meece. The Magnor Plant depot is currently used by Morgan Sindall but it is being vacated in the next few years and so it will be available for redevelopment within the first five years of the new Plan period.

The site is within the boundary for the proposed new Meecebrook settlement. We are in support of the strategic allocation at Meecebrook and the spatial strategy generally, although below we set out comments in relation to the allocation and its supporting information.

Policy 7: Meecebrook site allocation

Our site is within the boundary of the new settlement, however the Concept Masterplan does not identify a specific use for our allocation. As Morgan Sindall are vacating the site and it is a Sui Generis use, this limits opportunities for similar occupiers and therefore any continuation of the use.

Redevelopment of the site is therefore necessary. The draft Plan must provide sufficient certainty for our Client. Given its gateway location and position in close proximity to the proposed new station and other uses including local centres, it would make sense for our site to be identified as a location



for either residential or employment uses within the new settlement. Within the first five years of the Plan the site will be available, free of legal constraint and therefore deliverable.

New settlements are inevitably long-term prospects, and this is reflected by the proposed trajectory not suggesting housing completions until 2030/31 at the earliest. The success of this new settlement will rely in part on land which can deliver early, helping to kickstart wider development with investment in parcels which are relatively unconstrained in terms of existing access, lack of reliance of third party land etc. This is particularly important given the lead-in times for infrastructure for a new settlement, as acknowledged at paragraph 6.7 of the latest Infrastructure Delivery Plan.

Our Client's site is an ideal location for an early phase of development as it is already served from Swynnerton Road. It will form a key gateway around the Meece Brook corridor, a highly attractive and accessible location in terms of the wider settlement and public transport. It could deliver in accordance with the parameters and principles that will be set out in the Framework Masterplan Supplementary Planning Document.

We would caution against the policy requirements being too inflexible in the context of the importance of early delivery. Policy 7 criterion N states:

“Development proposals at Meecebrook must come forward comprehensively, accord with the requirements of this policy and be in accordance with the concept plan and design and development principles set out in Policy 8 and Appendix 9 and the Meecebrook Framework Masterplan Supplementary Planning Document. Stafford Borough Council will not support ad hoc or piecemeal development which is contrary to the aims of this policy or is inconsistent with the framework masterplan.”

Providing an application is consistent with the Meecebrook Framework Masterplan Supplementary Planning Document (to be prepared) and does not preclude or undermine the delivery of the wider new community, then we do not see why such an early application could not be considered favourably. The requirement for development proposals to “come forward comprehensively” may be misconstrued as requiring one application for the entire site. This is unrealistic given the nature of differing landowner ambitions and timescales and would greatly affect the ability for 3,000 new dwellings to be delivered in the Plan period.

If there is a greater requirement for early delivery of employment land, this could be accommodated on our site as well. We note the evidence base refers to 30 hectares of employment land being delivered at Meecebrook, 15 hectares of which would be in the Plan period. The Topic Paper recognises at paragraph 3.10:

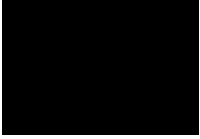
“that in view of current market conditions there is considerable uncertainty about the timetable for this land coming forward. It is also recognised that at new settlements employment land often becomes established after housing as the settlement gradually becomes more self-contained.”

This would support our request for greater clarity and certainty on proposals for our land.

We support the objectives outlined within the Vision Document, including its focus on active travel and the aspirations for a 15-minute neighbourhood. The identification of our site for redevelopment which could come forward early would help to establish these principles early on.

We trust these comments are useful and we look forward to discussing with you in more detail. Please contact me in the meantime if you have any queries. Thank you.

Yours sincerely



JAMES BONNER
Planning Associate Director

From: James Bonner
Sent: 12 December 2022 11:45
To: Strategic Planning
Subject: Stafford Local Plan Review - former Meaford Power Station
Attachments: 221212 Meaford - Stafford Preferred Options Reps.pdf

Good morning,

We have responded using the online forms on behalf of our client's land interests at the former Meaford Power Station. Please also find attached our letter. We would be happy to discuss this with you at your convenience. Thank you.

Kind regards,

James Bonner
Planning Associate Director



From: Preferred Options Consultation [REDACTED]
Sent: 12 December 2022 11:23
To: Strategic Planning Consultations
Subject: Preferred Options Consultation - Submitted Response

Full name: **James Bonner**

Email: [REDACTED]

Agents and Developers

Organisation or Company: **St Modwen Properties Ltd**

Age: **Prefer not to say / not applicable**

Added to database: [REDACTED]

Topics (Contents page): **Development Strategy and Climate Change Response**

Vision and Objectives

Q1 - Which 3 are most important to you? **Not asked**

Development Strategy and Climate Change

Q2 - Do you agree with each of the policies in this chapter?

Policy 1 (Development Strategy): **No**

Comments: **See our covering letter. We consider the employment land requirement should be increased, so we support the recognition for further work. However consideration must be given to other mechanisms to establish the employment need beyond labour demand and past trends, for instance through the use of a methodology that accounts for suppressed demand, as set out in the BPF report Levelling Up – The Logic of Logistics (2022). In summary, we object to draft Policy 1 as it does not specifically allocate the land at the former Meaford Power Station for employment uses, despite there being an existing allocation and extant planning permission. The reliance on saved Policy E5, particularly without any reference to it in draft Policy 1, will undermine the draft Plan’s vision and objectives to deliver economic growth and jobs. This should be rectified by a specific policy for the site with flexibility across Use Classes E(g)(iii)/B2/B8. The land should also be removed from the Green Belt on the basis of exceptional circumstances listed above, including the fact that impacts on the Green Belt can be minimised if the policy wording reflects the extant outline condition 6 floorspace limits.**

Policy 2 (Settlement Hierarchy): **Yes**

Comments: **No reply**

Policy 3 (Development in open countryside): **Yes**

Comments: **No reply**

Policy 4 (Climate change and development requirements): **No**

Comments: **We support the ambitions of this policy but we would recommend further work to ensure it is deliverable in respect of non-residential development, particularly smaller commercial units which may in some cases struggle to address all of the policy requirements. Having reviewed the evidence base document 'Staffordshire Climate Change Mitigation and Adaptation - Addendum: Potential Viability Implications of Different Policy Options (2020)', it is not clear whether the viability implications for a range of unit types and sizes have been assessed.**

Policy 5 (Green Belt): **Yes**

Comments: **No reply**

Policy 6 (Neighbourhood plans): **Yes**

Comments: **No reply**

Meecebrook Garden Community

Q3 - Do you agree with proposed new garden community: **Yes**

Comments: **No reply**

Site Allocation Policies

Q4 - Do you agree with the proposed allocations?

Policy 9 (North of Stafford): **Yes**

Comments: **No reply**

Policy 10 (West of Stafford): **Yes**

Comments: **No reply**

Policy 11 (Stafford Station Gateway): **Yes**

Comments: **No reply**

Policy 12 (Other housing and employment land): **No**

Comments: **Meaford is not recognised (see comments on policy 1)**

Site Allocation Policies (continued)

Q5 - Do you agree with the proposed allocations?

Policy 13 (Local Green Space): **Yes**

Comments: **No reply**

Policy 14 (Penk and Sow): **Yes**

Comments: **No reply**

Policy 15 (Stone Countryside): **Yes**

Comments: **No reply**

Economy Policies

Q6 - The local plan seeks to protect previously allocated and designated industrial land and support home working and small-scale employment uses. Do you agree? **Yes**

Comments: Although as mentioned in Policy 1, Meaford should be recognised as an employment site

Q7 - The Stafford Borough Plan proposes policies around the town centres uses, agriculture and forestry development, tourism development and canals. Do you agree? **Yes**

Comments: **No reply**

Housing Policies

Q8 - The local plan proposed a policy (23) on affordable housing. Do you agree? **Yes**

Comments: **No reply**

Q9 - The local plan proposes a policy (30) to help meet identified local need for pitches for Gypsies and Travellers. Do you agree? **Yes**

Comments: **No reply**

Q10 - The local plan proposes policies around homes for life, rural exception sites, new rural dwellings, replacement dwellings, extension etc. Do you agree? **Yes**

Comments: **No reply**

Design and Infrastructure Policies

Q11 - Do you agree with policies? **Yes**

Comments: **No reply**

Environment Policies

Q12 - Do you agree with policies? **Yes**

Comments: **No reply**

Connections

Q13 - Do you agree with policies? **No**

Comments: **Policy 53: We note at Appendix 4 there are minimum car parking standards for employment floorspaces across different Use Classes. These parking standards differ from the St Modwen standards that reflect industry experience, occupier demands and operational efficiencies. We would object to the imposition of minimum standards without any flexibility for deviation. We therefore welcome the inclusion of the criteria at B 1-6, but we request the addition of another to ensure development is not unduly restricted. We consider the addition of a seventh criterion would better reflect site-specific requirements: "7. The site-specific context and operational requirements of the proposed development, including evidence to justify its parking requirements and how parking will be managed on-site."**

Evidence Base

Q14 - Have we considered all relevant studies and reports? **Yes**

Comments: **No reply**

Q15 - Do you think there is any further evidence required? **Yes**

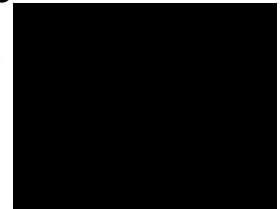
Comments: **Further viability work for small scale employment**

General Comments:

See covering letter

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NEWCASTLE
READING
SOUTHAMPTON

**BARTON
WILLMORE** now  **Stantec**



Strategic Planning & Place
Stafford Borough Council
Civic Centre
Riverside
Stafford
ST16 3AQ

BY EMAIL

29989/A3/JB/bc

12th December 2022

Dear Sir/Madam

REPRESENTATIONS TO STAFFORD BOROUGH COUNCIL LOCAL PLAN REVIEW - PREFERRED OPTIONS CONSULTATION

SUBMITTED ON BEHALF OF ST MODWEN PROPERTIES – MEAFORD BUSINESS PARK

We write on behalf of our Client, St Modwen Properties, in respect of its land interests at Meaford Business Park, at the site of the former Meaford Power Station (the 'site'). Our Client supports the continued identification of the site within the draft Plan as a site which will assist in meeting the Borough's economic and job growth aspirations. However, we think there are several issues in respect of our site's allocation that will undermine this potential, and we offer suggestions below.

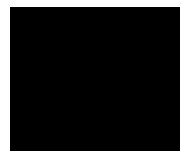
St Modwen have recently submitted a new outline planning application and two reserved matters for the employment redevelopment of the entire site, in accordance with the allocation in the Development Plan. These applications are supported by significant amounts of technical work and were subject to large application fees. This investment demonstrates a clear sign of St Modwen's intent to build out the site as soon as possible.

Background

Redevelopment of the former Meaford Power Station was approved in May 2007 (98/35897/OUT). Permission was granted for:

"Change Of Use to B1 B2 & B8 Buildings Sports Facilities Roadways And New Roundabout 35897".

An extension of time (10/13609/EXT) was approved on 21st July 2010. A second extension of time (14/21379/EXTO) was approved on 7th May 2015, with permission granted for:



“Extension of time on Outline Planning permission number 98/35897/OUT as previously extended by planning approval number 10/13609/EXT (Change of use to B1, B2 and B8 buildings, roadways and new roundabout)”.

This latest planning permission has been implemented, with one unit currently occupied on site. Reserved Matters have been submitted pursuant to 14/21379/EXTO for the redevelopment of the remainder of the site (references 22/35950/REM and 22/35956/REM). In addition, a new outline planning application has been submitted for the entire site (reference 21/35159/OUT) with the following description of development:

“Outline planning application for the creation of development platforms and phased development comprising up to 96,932sqm of employment floorspace (Use Classes E(g)(iii)/B2/B8) and up to 2 hectares of battery storage (Use Class Sui Generis), ancillary office space, new internal site roads and the use of existing accesses (including western access onto Meaford Road for emergency access), parking, ecology and biodiversity enhancements, landscaping, drainage, ancillary works and associated infrastructure, involving demolition, site clearance and remediation (All Matters Reserved except access, in part)”.

The Meaford Energy Centre (MEC) was approved under a Development Consent Order in 2016. This consent has since lapsed and cannot be implemented. It is not included within either the new outline or Reserved Matters.

The site is currently within the Green Belt. We have previously submitted representations requesting that the land is removed from the Green Belt. This continues to be our position as set out in more detail below.

Policy 1: Development Strategy

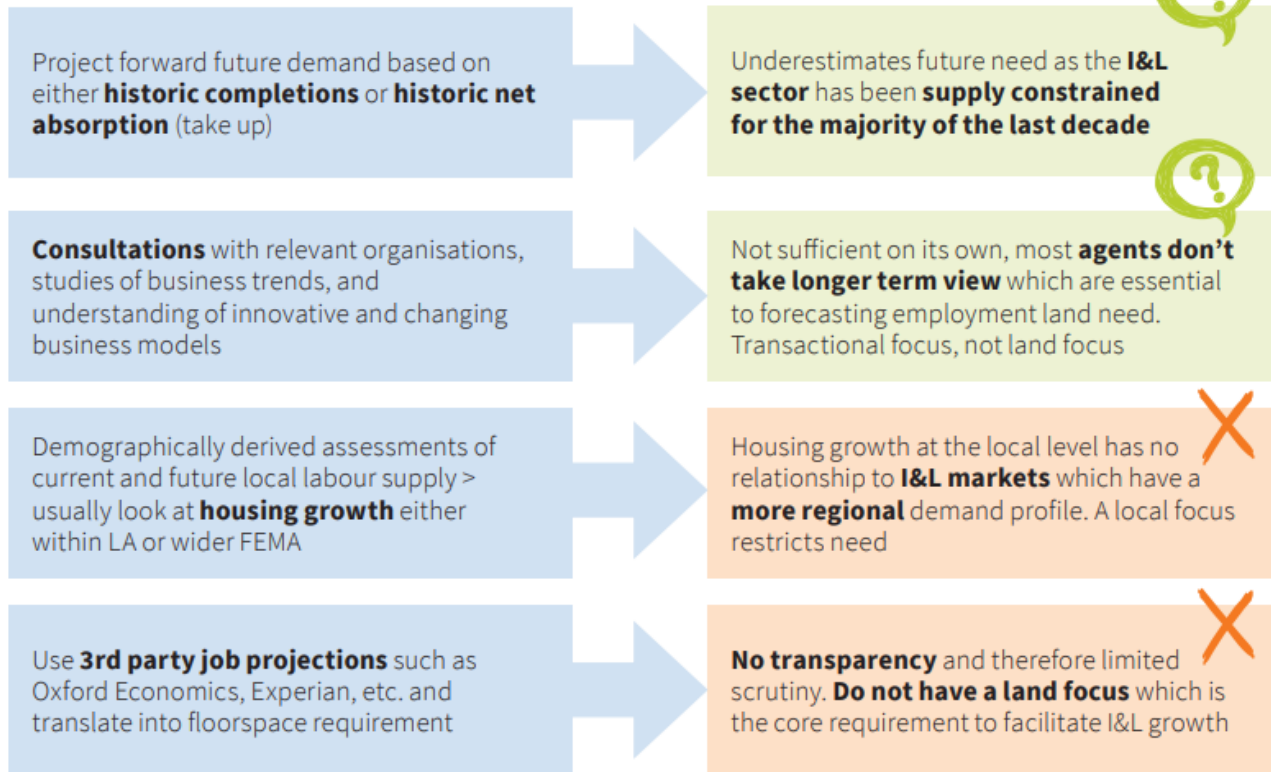
Our comments are made in relation to the provision of employment land only. Whilst we have no objections to the spatial strategy and quantum and distribution of development (albeit we think the employment floorspace could be higher), we do have concerns in relation to the strategic employment site at the former Meaford Power Station.

The Housing and Employment Land Numbers Topic Paper (Preferred Options Stage) sets out that a minimum of 79 hectares (rounded to 80 hectares) of new employment land between 2020-2040 is proposed, which is reflected in draft Policy 1. 80 hectares is the labour demand scenario in the Economic and Housing Development Needs Assessment (January 2020) that the evidence base document considers best aligns with the preferred housing requirement. We would support setting a higher employment land requirement that takes into account both labour demand and past take up scenarios. We note that the EHNDA may be updated after the Preferred Options consultation to take into account labour demand and past take up scenarios. We consider the employment land requirement should be increased, so we support the recognition for further work. However consideration must be given to other mechanisms to establish the employment need beyond labour demand and past trends, for instance through the use of a methodology that accounts for suppressed demand, as set out in the BPF report Levelling Up – The Logic of Logistics (2022). Using this method for England it:

“Estimates future demand will be at least 29% higher than historic levels, equating to a minimum of 44 million sqft per annum (net).” (page 21)

This figure varies across the various key industrial and logistics markets across the country, but for Stafford and Stoke the report indicates additional demand (as a minimum) should also be 29% above historic levels (page 22). We believe this is the most appropriate way to assess employment land requirements as the measures set out in the Planning Practice Guidance are inadequate for the reasons set out below¹:

Current NPPG methods are not fit for purpose



Source: Savills

The target of 80 hectares is comprised of commitments and two new allocations at Redhill (31.15 hectares) and Ladfordfields (5.6 hectares), both identified as additional shorter-term supply to buffer against non-implementation of existing consents; in addition to a new allocation of 30 hectares at the Meecebrook Garden Community, which will be delivered towards latter of Plan period. At 31st March 2022 employment commitments totalled 108.52 hectares according the Topic Paper, or 103.02 hectares once a net loss of 5.5 hectares between 2020-2022 has been accounted for. Meaford is one of the largest components of this existing supply at 32.53 hectares.

Whilst there may have been questions around potential non-implementation of our site in the past, the Council can have confidence it is now coming forward. There is a clear will from St Modwen’s perspective to deliver employment development as soon as possible, as demonstrated by the Reserved Matters submissions covering the whole site. Later phases may rely on a standalone detailed submission under the new outline, if for instance a specific occupier comes forward with requirements

¹ From page 20 of Levelling Up – The Logic of Logistics (BPF, 2022)

significantly deviating from the submitted Reserved Matters. It is for this reason that the policy context for Meaford is particularly important.

The draft Plan does not propose to replace the current Plan for Stafford Borough Policy E5 (Major Developed Sites in the Green Belt). Policy E5 states:

“The following sites will be identified as previously developed sites (whether redundant or in continuing use, excluding temporary buildings) within the Green Belt, where limited infilling or the partial or complete redevelopment will be supported for employment purposes consistent with Spatial Principle SP7, which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development;

...

- **Former Meaford Power Station, Meaford, Stone.”**

There is currently a clear relationship between adopted Policy E5 and Spatial Principle 7 (SP7), which guides the location of new development. SP7 states:

“Development in other locations (in settlements or in the countryside) will only be supported where:

...

- i) If located within the Green Belt, it is consistent with national policies for the control of development, and Policy E5”**

Neither the new policy replacing SP7 (draft Policy 3), nor the new Green Belt policy (draft Policy 5) have any reference to saved Policy E5. Draft Policy 17 (Recognised Industrial Estates) also has no reference to Meaford.

We consider this to be a significant issue as saved Policy E5 has no context or weight within the rest of the draft Plan, including the spatial strategy. It is not clear how its current designation as a Major Developed Site in the Green Belt would have any relevance to an assessment against a planning application at the point of the new Local Plan being adopted.

This could present significant problems for the draft Plan’s vision and objectives to ‘develop a high value, high skill, innovative and sustainable economy’ and ‘to deliver sustainable economic and housing growth to provide income and jobs’.

The approach to employment growth in the draft Plan needs to be positively prepared and effective and a site-specific policy is the best way to achieve this. It is necessary to provide certainty around delivery for the benefit of both our Client and the Council in terms of employment land supply. This would align with the draft Plan at paragraph 1.15, and its support of the opportunities and priority interventions highlighted in the Stoke-on-Trent and Staffordshire Local Enterprise Partnership Local Industrial Strategy, including:

- **“The need to create more flexible small business and grow-on space in key centres and in identified employment sites in rural areas; and**
- **The need to deliver strategic employment sites for inward investment and expansion.”**

To achieve this the policy needs to be sufficiently flexible in its approach to Use Classes. This would be consistent with the EHDNA’s objectives, which states at page 4:

“It will be important to ensure that any employment land identified in the emerging plan takes into consideration the views from the market and relative market strengths to ensure demand for employment land is captured across the Borough, capitalising on its identified strengths”.

In addition to highlighting significant market changes since the adoption of the Local Plan, the EHDNA points to a shortage of ‘good quality B-Class land’ in the Borough compared to the Black County and Southern Staffordshire areas. The proximity of the site to strategic road network and key centres such as Stoke, and Stafford places the site in a good position to contribute to addressing this shortage. In the Industrial and Logistics sector for example, demand is outweighing supply, with vacancy rates typically low due to constant demand and competition (paragraph 6.47). The 2018 Stoke-on-Trent and Staffordshire LEP’s Strategic Economic Plan (SEP) points to the LEP’s target to grow employment at a time when ‘skills gaps and shortages are becoming more acute’. The EHDNA also identifies the site as an ‘important industrial estate and business park’ at paragraph 6.11. The site is therefore important for the current and new Local Plan strategies, and this should be reflected in its own allocation policy.

Green Belt

As we have set out previously, we consider that the site should be removed from the Green Belt. We have undertaken an assessment against NPPF’s five purposes below.

Table 1: Contribution of the Site to the NPPF Purposes of the Green Belt

Purpose	Commentary	Contribution
Check the unrestricted sprawl of large built-up areas	The site is not adjoined to any urban area so in Green Belt policy terms, has no potential for sprawl. Whilst being located close to the settlement of Stone, the site is robustly contained from it by approximately 360m of open land, including intervening vegetation, landform, a watercourse and the Trent and Mersey Canal. As a result, a perception of separation between the two is maintained, including when passing along the transport corridors in the vicinity.	None
Prevent neighbouring towns from merging	The site does not merge with Stone, for the reasons noted above. In the visual experience from the north-south transport corridors, where views are obtained, the existing built features within the site, both operational and redundant, provide some perception of the reduction of the separation between Stone and the Potteries conurbation to the north.	Limited
Assist in safeguarding the countryside from encroachment	Whilst there are only limited built forms within the site and therefore, it has some perception of openness, the site is developed in character, owing to the engineered landforms, remaining redundant structures and operational infrastructure.	Limited-Some
Preserve the setting and special	The site is separated from the historic centre of Stone by extensive built form within Stone, landform and vegetation and has no visual, physical	None

Purpose	Commentary	Contribution
character of historic towns.	or apparent character relationship with it. As such the site, which is predominantly derelict post-industrial land, makes no contribution to the setting and special character of the historic centre of the town.	

In light of the above, the site is considered to make a limited contribution to the purposes of the Green Belt. Whilst it currently appears as largely open land, it is developed in character, robustly separated from Stone and other settlements and only provides limited perception of merging of towns in the visual experience from transport corridors.

On this basis, it is considered that the site remains appropriate for redevelopment for employment uses as set out in the Development Plan (Policy E5) and extant outline consent. An acceptance of a degree of harm to the openness of the Green Belt is core to Policy E5 and the extant outline consent (and the MEC DCO, as now expired) and inevitable from any proposal for built form on the site. Nevertheless, it is considered that there is potential to minimise any perceived harm to the Green Belt from the proposed uses, through a robust landscape strategy based on retention and reinforcement of the existing wooded framework of the site, combined with carefully considered mitigation of the appearance of built form massing, which reduces the effect of development on visual openness. This has been demonstrated through both the new outline and Reserved Matters.

There are significant economic, social and environmental benefits associated with the site's redevelopment, as summarised in the Planning Statement supporting the new outline application:

- There is an extant planning permission for 110,000sqm of employment development which restricts built form in line with the former power station buildings (in order to protect the openness of the Green Belt)
- The site is allocated in the Development Plan for employment redevelopment; and there is a reliance on the site to meet employment land supply requirements within the Plan period
- The proposals involve the re-use of previously developed land
- Socioeconomic benefits including up to 224 direct and 217 indirect construction jobs, 1,097-2757 direct operational employment, £2.1 million-£2.5 million in business rates, and £51.4 million-£169.9 million GVA per annum when operational; and
- There is a significant need and immediate demand for 'investor ready' strategic employment sites owing to the very limited availability of sites and existing and new space under construction.

For these reasons we consider there are exceptional circumstances to remove the land from the Green Belt, which would reduce risks and provide greater certainty over its future redevelopment.

Suggested change

In summary, we **object to draft Policy 1** as it does not specifically allocate the land at the former Meaford Power Station for employment uses, despite there being an existing allocation and extant planning permission. The reliance on saved Policy E5, particularly without any reference to it in draft Policy 1, will undermine the draft Plan's vision and objectives to deliver economic growth and jobs. This should be rectified by a specific policy for the site with flexibility across Use Classes E(g)(iii)/B2/B8. The land should also be removed from the Green Belt on the basis of exceptional circumstances listed above, including the fact that impacts on the Green Belt can be minimised if the policy wording reflects the extant outline condition 6 floorspace limits.

Policy 4: Climate change development requirements

We support the ambitions of this policy, but we would recommend further work to ensure it is deliverable in respect of non-residential development, particularly smaller commercial units which may in some cases struggle to address all of the policy requirements. Having reviewed the evidence base document 'Staffordshire Climate Change Mitigation and Adaptation - Addendum: Potential Viability Implications of Different Policy Options (2020)', it is not clear whether the viability implications for a range of unit types and sizes have been assessed.

Policy 53: Parking Standards

We note at Appendix 4 there are minimum car parking standards for employment floorspaces across different Use Classes. These parking standards differ from the St Modwen standards that reflect industry experience, occupier demands and operational efficiencies. We would object to the imposition of minimum standards without any flexibility for deviation. We therefore welcome the inclusion of the criteria at B 1-6, but we request the addition of another to ensure development is not unduly restricted.

Suggested change

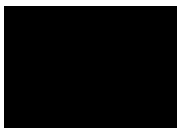
We consider the addition of a seventh criterion would better reflect site-specific requirements:

"7. The site-specific context and operational requirements of the proposed development, including evidence to justify its parking requirements and how parking will be managed on-site."

We trust these representations are helpful. We ask that we could please meet you at your earliest convenience to discuss this important site and its role in the draft Plan. Thank you.

Should you require any clarifications of the points raised please do not hesitate to contact me or Mark Sitch.

Yours sincerely



JAMES BONNER

Planning Associate Director

From: James Bonner
Sent: 12 December 2022 11:43
To: Strategic Planning
Subject: Stafford Local Plan Review - Trentham Estate
Attachments: 221208 Trentham Estate Preferred Options Reps_.pdf

Good morning,

We have responded using the online forms on behalf of our client's land interests at the former the Trentham Estate. Please also find attached our letter. We would be happy to discuss this with you at your convenience. Thank you.

Kind regards,

James Bonner
Planning Associate Director



From: Preferred Options Consultation [REDACTED]
Sent: 12 December 2022 11:41
To: Strategic Planning Consultations
Subject: Preferred Options Consultation - Submitted Response

Full name: **James Bonner**

Email: [REDACTED]

Agents and Developers

Organisation or Company: **Trentham Leisure Limited**

Age: **Prefer not to say / not applicable**

Added to database: [REDACTED]

Topics (Contents page): **Development Strategy and Climate Change Response**

Vision and Objectives

Q1 - Which 3 are most important to you? Not asked

Development Strategy and Climate Change

Q2 - Do you agree with each of the policies in this chapter?

Policy 1 (Development Strategy): **No**

Comments: **See covering letter. There is a lack of recognition for the Estate and its importance to tourism and retail and therefore the wider economy. The policy fails to adequately set out a strategy for retail and leisure as required by NPPF paragraph 20.**

Policy 2 (Settlement Hierarchy): **No**

Comments: **See covering letter. If the North Staffordshire Urban Areas are being separated out, we request that the wording of Policy 2 includes Trentham and Trentham Gardens within the settlement hierarchy.**

Policy 3 (Development in open countryside): **No**

Comments: **See covering letter. There is a lack of recognition for the Estate and its importance to tourism and retail and therefore the wider economy. The policy fails to adequately set out a strategy for retail and leisure as required by NPPF paragraph 20. We have proposed suggested changes.**

Policy 4 (Climate change and development requirements): **No reply**

Comments: **No reply**

Policy 5 (Green Belt): **No reply**

Comments: **No reply**

Policy 6 (Neighbourhood plans): **No reply**

Comments: **No reply**

Meecebrook Garden Community

Q3 - Do you agree with proposed new garden community: **No reply**

Comments: **No reply**

Site Allocation Policies

Q4 - Do you agree with the proposed allocations?

Policy 9 (North of Stafford): **No reply**

Comments: **No reply**

Policy 10 (West of Stafford): **No reply**

Comments: **No reply**

Policy 11 (Stafford Station Gateway): **No reply**

Comments: **No reply**

Policy 12 (Other housing and employment land): **No reply**

Comments: **No reply**

Site Allocation Policies (continued)

Q5 - Do you agree with the proposed allocations?

Policy 13 (Local Green Space): **No reply**

Comments: **No reply**

Policy 14 (Penk and Sow): **No reply**

Comments: **No reply**

Policy 15 (Stone Countryside): **No reply**

Comments: **No reply**

Economy Policies

Q6 - The local plan seeks to protect previously allocated and designated industrial land and support home working and small-scale employment uses. Do you agree? **Yes**

Comments: See covering letter. Given the Estate's current success, and its accessibility via a regular bus service from Stafford, Stone and Stoke, it can and should be recognised in the draft Plan for its potential contribution towards these economic objectives.

Q7 - The Stafford Borough Plan proposes policies around the town centres uses, agriculture and forestry development, tourism development and canals. Do you agree? **No**

Comments: **See covering letter. Policy 19: We request that the Trentham Retail Village should be identified as a defined centre in draft Policy 19. Policy 21: We request that the Estate is provided with its own site-specific policy that recognises its unique attraction as a tourism destination. We consider 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 draft Plan. We would like to discuss the principle of a policy and its wording with you. With or without this policy, draft Policy 21 should explicitly refer to the Estate in this context to provide a policy basis to support its ongoing success. The Policy should also be amended to include reference to sustainable rural tourism outside of town and local centres, as per NPPF paragraph 84.**

Housing Policies

Q8 - The local plan proposed a policy (23) on affordable housing. Do you agree? **No reply**

Comments: **No reply**

Q9 - The local plan proposes a policy (30) to help meet identified local need for pitches for Gypsies and Travellers. Do you agree? **No reply**

Comments: **No reply**

Q10 - The local plan proposes policies around homes for life, rural exception sites, new rural dwellings, replacement dwellings, extension etc. Do you agree? **No reply**

Comments: **No reply**

Design and Infrastructure Policies

Q11 - Do you agree with policies? **No reply**

Comments: **No reply**

Environment Policies

Q12 - Do you agree with policies? **Yes**

Comments: **See our covering letter for some suggested changes. However no specific change would be needed to the policy if a site-specific policy for the Estate was included, which could reference the heritage strategy.**

Connections

Q13 - Do you agree with policies? **No reply**

Comments: **No reply**

Evidence Base

Q14 - Have we considered all relevant studies and reports? **No reply**

Comments: **No reply**

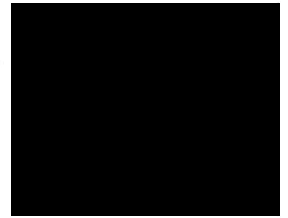
Q15 - Do you think there is any further evidence required? **No reply**

Comments: **No reply**

General Comments:

No reply

BIRMINGHAM
BRISTOL
CAMBRIDGE
CARDIFF
EDINBURGH
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LEEDS
LONDON
MANCHESTER
NEWCASTLE
READING
SOUTHAMPTON



Strategic Planning & Place
Stafford Borough Council
Civic Centre
Riverside
Stafford
ST16 3AQ

BY EMAIL

30989/A3/MAS/JB/bc

8th December 2022

Dear Sir/Madam

REPRESENTATIONS TO STAFFORD BOROUGH COUNCIL LOCAL PLAN REVIEW - PREFERRED OPTIONS CONSULTATION

SUBMITTED ON BEHALF OF TRENTHAM LEISURE LIMITED – TRENTHAM ESTATE AND GARDENS

Thank you for inviting comment on your Preferred Options consultation for the Stafford Borough Council Local Plan Review (the 'draft Plan'). We make these representations on behalf of our Client, Trentham Leisure Limited, who operate the Trentham Estate and Gardens ('the Estate').

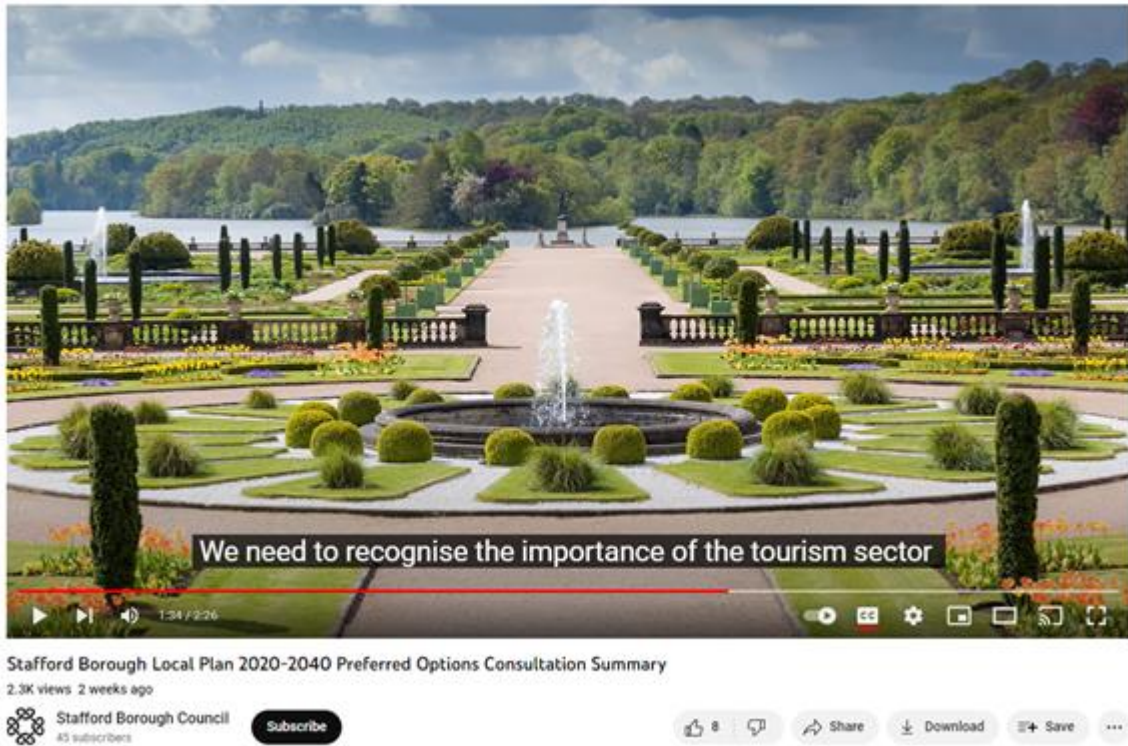
The Estate is home to the award-winning Trentham Gardens and Trentham Shopping Village. Both are hugely successful visitor destinations, with Trentham Gardens alone attracting 772,678 visitors in 2021, making it the 5th highest visited paid-for attraction in England according to Visit England¹. Our Client is keen to ensure that their future plans to continue this success, and the future sustainability of the Estate and its numerous heritage assets, is supported through forthcoming planning policy.

As set out below, the Council already considers the Estate to be an important tourist destination. This is also confirmed by the Council's own Local Plan Review Summary² supplementing the draft Plan which contains the image below of the Estate with the accompanying caption 'We need to recognise the importance of the tourism sector':

¹<https://www.visitbritain.org/visitengland-annual-survey-2021-highlights-impact-visitor-attractions#:~:text=The%20most%20visited%20paid%20for,still%20down%2015%25%20on%202019>

² <https://www.youtube.com/watch?v=s1uOs90UcgY>





This emphasises the role the Estate plays in the Borough's tourism industry and wider economy, and why a specific policy is required to support its long-term sustainability. This is also demonstrated in the Stafford Borough Council Corporate Business Plan 2021-24 which highlights on page 13 that the Borough is:

"home to major tourist attractions including the Ancient High House, Stafford Castle, Victoria Park, Trentham Estate, Shugborough and Cannock Chase".

We previously made representations as part of the Issues and Options consultation in April 2020. Below, we provide comments chronologically to draft policies we consider relevant at this time.

Vision and Objectives

The Scoping the Issues Consultation established six key and reoccurring themes that was set to inform this. One of these themes was the provision of an enhanced service centre and tourism destination. We note that this has not been carried forward to the latest draft Plan and there is no mention of the tourism economy in the proposed Vision or 8 Objectives which sit underneath. We argue that seeking to grow and enhance the tourism industry should be included in the Vision and Objectives given the importance for the Borough's economy, as we set out in further detail later in these representations. In addition, it should be clearly identified that the opportunity to grow tourism is Borough wide, rather than just Stafford Town, as demonstrated by the 'major tourist attractions' listed above, including the Estate.

Suggested change

The Vision and Objectives should recognise the importance of the tourism and leisure sectors and the need for supporting key destinations such as the Estate.

Policy 1: Development Strategy

The Estate is not recognised in the key draft policies (1, 2 and 3) which determine where development will be permitted. For Policy 1, the Estate is not recognised in the spatial strategy. For Policy 2, it is not within a defined settlement in the settlement hierarchy (see below). For Policy 3 (development in the open countryside), because the Estate is outside of the defined settlements and within the Green Belt, it is not captured by criterion 4 (tourism development). In combination with the lack of identification through a site-specific policy or draft Policy 21 (Tourism), this presents an overly challenging policy position for the Estate as it essentially falls between the cracks. This is counterintuitive given the status and success of the Estate and its contribution to the local and wider economy.

As we note later, a specific policy for the Estate should be included to ensure there is a policy context for future development to support its ongoing successes. This should then be reflected in the Development Strategy as part of draft Policy 1.

We therefore object to Policy 1 as it is not positively prepared, justified or consistent with national policy. There is a lack of recognition for the Estate and its importance to tourism and retail and therefore the wider economy. The policy fails to adequately set out a strategy for retail and leisure as required by NPPF paragraph 20.

Suggested change

The Estate should be recognised within the Development Strategy at draft Policy 1.

Policy 2: Settlement Hierarchy

The settlement hierarchy in the Issues and Options Plan proposed the North Staffordshire Urban Areas as Tier 3. This acknowledged the important role they play in meeting development needs. However, the new draft Plan omits reference to the North Staffordshire Urban Areas and lists the names of the settlements out instead. The Settlement Assessment (July 2018) suggests that 'Trentham Gardens' forms part of the North Staffordshire Urban Areas. Whilst we support this position given the sustainability of the Estate and the proximity to a number of services, facilities, and existing housing, we request that the wording of the draft Plan, and the settlement hierarchy in particular, is clear that this includes Trentham and Trentham Gardens.

Throughout these representations we are suggesting the need for 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. This would not remove its Green Belt status or the protections afforded by it and this could be reflected in the wording of the specific policy for the Estate.

We therefore object to Policy 2 as it is not positively prepared, justified or consistent with national policy. There is a lack of recognition for the Estate and its importance to tourism and retail and therefore the wider economy. The policy fails to adequately set out a strategy for retail and leisure as required by NPPF paragraph 20.

Suggested change

If the North Staffordshire Urban Areas are being separated out, we request that the wording of Policy 2 includes Trentham and Trentham Gardens within the settlement hierarchy.

Policy 3: Development in the open countryside – general principles

As noted above, the way in the which the draft Plan is currently written will undermine any future applications at the Estate as it has no policy position. Whilst we are suggesting changes to several policies which may rectify this, we consider a change to draft Policy 3 is necessary to ensure the Estate is recognised despite its location in the Green Belt. This is particularly important if no change is proposed to draft Policy 2 to include the Estate in a defined settlement.

We therefore object to Policy 3 as it is not positively prepared, justified or consistent with national policy. There is a lack of recognition for the Estate and its importance to tourism and retail and therefore the wider economy. The policy fails to adequately set out a strategy for retail and leisure as required by NPPF paragraph 20.

Suggested changes

Draft Policy 3A should be amended as follows (changes underlined):

“Outside of settlement boundaries defined on the policies map, and outside of the Green Belt (within which development will be controlled in accordance with national policy) with the exception of Trentham Estate, in order to protect the countryside from unnecessary and incongruous development only the following categories of development will be supported”

Or specific reference should be made to the Estate at 3.A.4.

Economy Policies

Paragraph 6.10 of the Issues and Options Plan stated that there will be a need to allocate employment land that is flexible in nature to meet the evolving needs and demands of the economy and this should be allocated within areas where it has the most benefit to existing and potential employers. This does not appear to have followed on to the Preferred Options Plan. The published Economic and Housing Development Needs Assessment (EHDNA) finds that future job growth prospects in the Borough are modest due to past trends and it notes that the restructuring of the Borough’s manufacturing sector is set to continue³. It sets out a number of growth scenarios and a recommended mix of uses to assist in delivering economic growth in light of this.

In discussing current trends, paragraph 6.34 of the EHDNA identifies that Stafford could grow its tourism section and needs to become a destination for eating, drinking and leisure activities. It is not clear whether this is in relation to just the Town Centre, but the benefits of leisure and tourism elsewhere in the Borough are clear in local policies and the NPPF. For instance, paragraph 83 which looks to enable ‘sustainable rural tourism and leisure developments which respect the character of the countryside’.

The Stoke-on-Trent & Staffordshire Enterprise Partnership Strategic Economic Plan (April 2018) expresses a long-term interest in strengthening sectors including the visitor economy. This aim is supported by the Stafford Borough Council Corporate Business Park 2018-2021 which seeks to grow the visitor economy. The Strategic Economic Plan identifies the tourism sector as an important element of the job market, accounting for 10% of all employment across the County.

³ Paragraph 5.29 of the EHDNA.

The Destination Staffordshire Partnership Strategy and Stafford Borough Corporate Business Plan both recognise the increasing economic importance to the Borough of the visitor economy. Further, the Stoke on Trent and Staffordshire Enterprise Partnership's Strategic Economic Plan (SEP) identifies the visitor economy as a growth sector valuing it at £1.6bn County wide. The emerging Stafford Borough Economic Growth Strategy values the Borough's visitor economy sector as being worth £222m per annum.

On a regional scale, the Midlands Engine Strategy sets out five key objectives to address the region's key weaknesses, build on its opportunities and boost productivity and economic growth. It highlights the tourism economy as significant, noting that 'in 2013, the economic value (GVA) of tourism in the Midlands was £6.33 billion' (page 26). This is reflected in the Strategy's fifth key objective of 'Enhancing quality of life in order to attract and retain skilled workers, as well as to foster the local tourist economy.'

Given the Estate's current success, and its accessibility via a regular bus service from Stafford, Stone and Stoke, it can and should be recognised in the draft Plan for its potential contribution towards these economic objectives.

Policy 19: Town Centres and Main Town Centre Uses

We consider 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. This would recognise the function of the Retail Village and its appeal as a retail destination, which also supports the attractiveness of the wider Estate as a tourism destination.

We therefore object to Policy 19 as it is not positively prepared, justified or consistent with national policy. There is a lack of recognition for the Estate and its contribution to the economy through its retail provision and associated tourism offer. The policy fails to adequately set out a strategy for retail as required by NPPF paragraph 20 and does not identify the role that the centre plays as required by NPPF paragraph 86.

Suggested change

We request that the Trentham Retail Village should be identified as a defined centre in draft Policy 19.

Policy 21: Tourism Development

The Development Plan recognises the importance of the Estate as a tourism destination through Policy E6 of the Part 1 Plan, with reference made to the Estate in the supporting text. Policy E6 is being replaced by draft Policy 21, but the new policy does not contain sufficient recognition of the Estate's importance, with no reference to it in the policy wording or supporting text. In combination with the aforementioned lack of reference to the Estate elsewhere in the draft Plan, this presents a significant risk going forward.

Our Client has reviewed their Business Plan and from this it is clear there is more that the Estate can and should offer to ensure it remains a successful visitor attraction over the long term. This would help to deliver further local employment and economic growth, as well as a meaningful contribution to the Council's Corporate and Local Plan objectives, the aims of the SEP and regional growth through the Midlands Engine Strategy. To deliver this we consider it is necessary to have a specific policy for the Estate. This policy would recognise the special qualities of the natural and built environment here, whilst providing a policy basis for sensitive growth to ensure the sustainable future of the

Estate and its numerous designated heritage assets. Ideally the Estate would have its own policy, but in any case, it should be explicitly referred to in Policy 21.

In terms of its current wording we object to Part A of Policy 21 which states that:

“tourism development ... is a main town centre use and should, except where in accordance with the paragraphs of this policy, be located in defined town and local centres in accordance with Policy 19”

We appreciate this is trying to align with the definition of main town centre uses at page 68 of the NPPF (including theatres, museums, galleries and concert halls, hotels and conference facilities). However it appears to present any tourism development besides 'small scale tourism and visitor accommodation' (Part B) as unacceptable. There may be other types of sustainable rural tourism and leisure developments which should be supported at the Estate, which is not currently defined as a town or local centre.

We do not consider the draft Policy is consistent with the NPPF, which states at paragraph 84 that planning policies should enable 'sustainable rural tourism and leisure developments which respect the character of the countryside'.

We therefore object to Policy 21 as it is not positively prepared, justified or consistent with national policy. There is a lack of recognition for the Estate and its importance to the Borough's tourism offer and therefore the wider economy. The policy fails to adequately set out a strategy for retail and leisure as required by NPPF paragraph 20 and it fails to allow sustainable rural tourism as per NPPF paragraph 84.

Suggested change

We request that the Estate is provided with its own site-specific policy that recognises its unique attraction as a tourism destination. We consider 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 draft Plan. We would like to discuss the principle of a policy and its wording with you.

With or without this policy, draft Policy 21 should explicitly refer to the Estate in this context to provide a policy basis to support its ongoing success.

The Policy should also be amended to include reference to sustainable rural tourism outside of town and local centres, as per NPPF paragraph 84.

Policy 41: Historic Environment

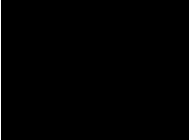
In the case of the Estate, where the historic and natural environment are so important to its success, we consider that it would be more appropriate to encourage maximisation of the wider benefit of historic assets by their incorporation into development schemes through imaginative design in addition to making use of the protections offered by the Planning (Listed Buildings and Conservation Areas) Act 1990 and the NPPF. This again supports the need for a specific policy for the Estate to allow any future beneficial development proposals to be informed by this context, alongside other key considerations such as the Green Belt.

Suggested change

No specific change would be needed to the policy if a site-specific policy for the Estate was included, which could reference the heritage strategy.

We trust these comments are useful and we look forward to discussing with you in more detail the long-term attractiveness and sustainability of the Estate. Please contact me or Mark Sitch in the meantime if you have any queries. Thank you.

Yours sincerely



JAMES BONNER
Planning Associate Director

From: Jo Russell
Sent: 12 December 2022 11:25
To: Strategic Planning Consultations
Subject: Preferred Options Response - west of A34, North of Pets at Home - Stoford/Cantrill
Attachments: Repls land west of A34 Cantrill.pdf

Good morning

Please find attached representations prepared by Stoford Properties Ltd. The representations are made with regards of land west of the A34, north of Pets a Home, Stafford.

The representations comprise

1. Completed response form
2. Representations prepared by Stoford
3. Appendices
 - 1: Land Agreement Plan
 - 2: Pets at Home approved layout plan
 - 3: Potential scheme and land ownership plan

Jo Russell MRTPI | Planning Director

T

M

E

W www.stoford.com

STOFORD

Registered in England No. 7848231 | Stoford Properties Ltd
Registered Office:



Contact Details

Full name (required): Jo Russell

Email (required): 

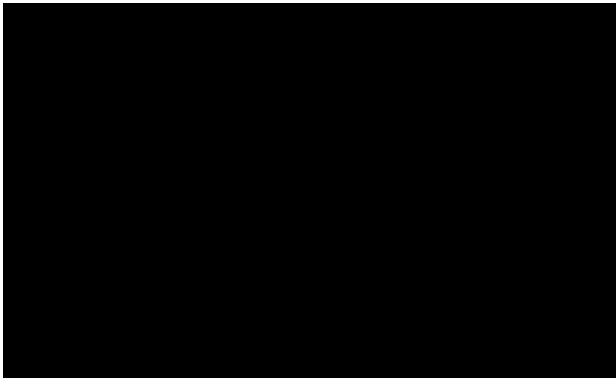
Tick the box that is relevant to you (required):

- Statutory Bodies and Stakeholders
- Agents and Developers
- Residents and General Public
- Prefer not to say

Organisation or Company Name (if applicable): Stoford Properties Ltd

Tick the box that is relevant to you:

(This is a non-mandatory question but helps us understand the demographic of our respondents.)



Do you want to be added to our Local Plan consultation database to be notified about future local plan updates?



Contents

The Local Plan Preferred Options includes the topics listed below.

Each topic has a series of standard questions in order for you to provide a response. You do not have to respond to each of the topics or answer all of the questions. The page numbers below relate to the page the topic starts in this consultation form.

- **Vision and Objectives** - page 5
- **Development Strategy and Climate Change Response** - page 6
- **Meecebrook Garden Community** - page 9
- **Site Allocation Policies** - page 10
- **Economy Policies** - page 14
- **Housing Policies** - page 16
- **Design and Infrastructure Policies** - page 18
- **Environment Policies** - page 19
- **Connections** - page 20
- **Evidence Base** - page 21
- **General Comments** - page 22

All of the local plan documents and the Local Plan 2020-2040: Preferred Options document are available here: <https://www.staffordbc.gov.uk/local-plan>

Vision and Objectives

Q1. There are eight objectives for the local plan to achieve the vision of:

"A prosperous and attractive borough with strong communities."

Of the following objectives which 3 are the most important to you?

Please make your choice from the list of objectives below. (Maximum of 3 to be selected)

Local Plan Preferred Options document reference: Page 12

- Contribute to Stafford Borough being net zero carbon by ensuring that development mitigates and adapts to climate change and is future proof.
- To develop a high value, high skill, innovative and sustainable economy.
- To strengthen our town centres through a quality environment and flexible mix of uses.
- To deliver sustainable economic and housing growth to provide income and jobs.
- To deliver infrastructure led growth supported by accessible services and facilities.
- To provide an attractive place to live and work and support strong communities that promote health and wellbeing.
- To increase and enhance green and blue infrastructure in the borough and to enable greater access to it while improving the natural environment and biodiversity.
- To secure high-quality design.

Development Strategy and Climate Change Response

Q2. The development strategy and climate change response chapter includes the policies below.

Do you agree with each of the policies in this chapter?

Select Yes or No for each of the policies and then use the box below each policy to add additional comments.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: Pages 19 to 40

Policy 1. Development strategy (which includes the total number of houses and amount of employment land to be allocated and the Stafford and Stone settlement strategies)

Yes

Policy 1 Comments:

Please see attached representations to Policy 1, prepared by Stoford Properties Ltd in respect of land west of the A34, north of Pets at Home

Policy 2. Settlement Hierarchy (Tier 1: Stafford, Tier 2: Stone, Tier 3: Meecebrook, Tier 4: Larger settlements, Tier 5: Smaller settlements)

Policy 2 Comments:

Policy 3. Development in the open countryside - general principles

Yes / No

Policy 3 Comments:

Policy 4. Climate change development requirements

Yes / No

Policy 4 Comments:

Policy 5. Green Belt

Yes / No

Policy 5 Comments

Policy 6. Neighbourhood plans

Yes / No

Policy 6 Comments:

Meecebrook Garden Community

Q3. The local plan proposes a new garden community called Meecebrook close to Cold Meece and Yarnfield. This new community is proposed to deliver housing, employment allocations, community facilities, including new schools, sport provision and health care facilities, retail and transport provision, which includes a new railway station on the West Coast Main Line, and high quality transport routes.

Do you agree with the proposed new garden community?

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: Pages 41 to 45

Comments:

Site Allocation Policies

Q4. The Stafford Borough Local Plan 2020 - 2040 proposes allocations for both housing and employment to meet the established identified need.

The site allocation policies chapter includes the policies below for housing and employment allocations.

Do you agree with the proposed allocations?

Select Yes or No for each of the following policies and then use the box below each policy to add additional comments.

Explain your reasoning and add any evidence to justify your response. Please provide details of alternative locations for housing and employment growth if you consider this is appropriate.

Ensure any comments relate to the policy comment box you are completing.

If you do want to submit a new site for consideration through the local plan process, we are still accepting sites through the Call for Site process, details are available here: <https://www.staffordbc.gov.uk/call-sites-including-brownfield-land-consultation>

Local Plan Preferred Options document reference: Pages 47 to 56 and appendix 2.

Policy 9. North of Stafford

Yes / No

Policy 9 Comments:

Policy 10. West of Stafford

Yes / No

Policy 10 Comments:

Policy 11. Stafford Station Gateway

Yes / No

Policy 11 Comments:

Policy 12. Other housing and employment land allocations.

(In your response, please specify which particular site you are referring to, if relevant.)

Yes / No

Policy 12 Comments:

Q5. The Stafford Borough Local Plan 2020 - 2040 proposes to allocate land for Local Green Space and Countryside Enhancement Areas throughout the borough.

The policies which relate to these proposals are listed below.

Do you agree with the proposed allocations?

Select yes or no for each of the policies and then use the box below each policy to add additional comments.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: Pages 56 to 59 and appendix 2.

Policy 13. Local Green Space

(In your response, please specify which particular site you are referring to, if relevant)

Yes / No

Policy 13 Comments:

Policy 14. Penk and Sow Countryside Enhancement Area (Stafford Town)

Yes / No

Policy 14 Comments:

Policy 15. Stone Countryside Enhancement Area

Yes / No

Policy 15 Comments:

Economy Policies

The Economy Policies chapter contains policies that seek to protect employment land and support economic growth within the Borough.

Q6. The local plan seeks to protect previously allocated and designated industrial land and support home working and small-scale employment uses.

The relevant policies are: 16, 17 and 18.

Do you agree with these policies?

Yes

Select Yes or No and then use the box to add additional comments. If referring to a specific policy, please include the policy number.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: pages 61 to 65

Comments:

Please see attached representations to Policy 16, prepared by Stoford Properties Ltd in respect of land west of the A34, north of Pets at Home

Q7. The Stafford Borough Plan proposes policies around the town centres uses, agriculture and forestry development, tourism development and canals.

The relevant policies are: 19, 20, 21 and 22.

Do you agree with these policies?

Yes / No

Select Yes or No and then use the box below to add additional comments. If referring to a specific policy, please include the policy number.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: pages 65 to 71

Comments:

Housing Policies

The Housing Policies chapter contains policies that seek to provide for identified need across the borough and support houseowners.

Q8. The local plan proposed a policy (Policy 23) on affordable housing.

Do you agree with this policy?

Yes / No

Select yes or no and then use the box below to add additional comments.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: pages 74 to 76

Comments:

Q9. The local plan proposes a policy (Policy 30) to help meet identified local need for pitches for Gypsies and Travellers. There are 2 new proposed sites; one near Hopton and the other near Weston.

Do you agree with this policy?

Yes / No

Select yes or no and then use the box below to add additional comments. In your response, please specify which particular site you are referring to, if relevant.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: pages 84 to 86

Comments:

Q10. The local plan proposes policies around homes for life, rural exception sites, new rural dwellings, replacement dwellings, extension of dwellings, residential subdivision and conversion, housing mix and density, residential amenity and extension to the curtilage of a dwelling.

The relevant policies are: 24, 26, 27, 28, 29, 21, 31, 32 and 33.

Do you agree with these policies?

Yes / No

Select yes or no and then use the box below to add additional comments. If referring to a specific policy, please include the policy number.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: pages 73 to 89

Comments:

Design and Infrastructure Policies

Q11. The design and infrastructure chapter contains policies on urban design general principles, architectural and landscape design, infrastructure to support new development, electronic communications, protecting community facilities and renewable and low carbon energy.

The relevant policies are: 34, 25, 36, 37, 38, 39 and 40.

Do you agree with these policies?

Yes / No

Select yes or no and then use the box below to add additional comments. If referring to a specific policy, please include the policy number.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: Pages 91 to 99.

Comments:

Environment Policies

Q12. The environment policies chapter contains policies on the historic environment, flood risk, sustainable drainage, landscapes, Cannock Chase Area of Outstanding Natural Beauty (AONB), Green and blue infrastructure network, biodiversity, Special Areas of Conservation (SAC), Trees, Pollution and Air Quality.

The relevant policies are: 31, 42, 43, 44, 45, 46, 47, 48, 49, 50 and 51.

Do you agree with these policies?

Yes / No

Select yes or no and then use the box below to add additional comments. If referring to a specific policy, please include the policy number.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: Pages 101 to 119.

Comments:

Connections

Q13. The connections policies chapter contains policies on transport and parking standards.

The relevant policies are: 52 and 53

Do you agree with these policies?

Yes / No

Select yes or no and then use the box below to add additional comments. If referring to a specific policy, please include the policy number.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: Pages 121 to 124.

Comments:

Evidence Base

To support the Local Plan 2020-2040 an evidence base has been produced.

The evidence base is available to view on our website here:

www.staffordbc.gov.uk/new-lp-2020-2040-evidence-base

Q14. Have we considered all relevant studies and reports as part of our local plan?

Yes / No

Select yes or no and then use the box below to add additional comments.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Comments:

Q15. Do you think there is any further evidence required?

Yes / No

Select yes or no and then use the box below to add additional comments.

If you think additional evidence is needed, please state what you think should be added and explain your reasoning.

Ensure any comments relate to the policy comment box you are completing.

Comments:

General Comments

If you have any further comments to make on the Local Plan Preferred Options document and evidence base, please use the box below.

If you need further space to add comments, please add pages to the end of the consultation form and reference which question you are answering.

Thank you for taking the time to complete this consultation form.

Completed forms can be submitted by email to:
strategicplanningconsultations@staffordbc.gov.uk

Or returned via post to: Strategic Planning and Placemaking, Stafford Borough Council, Civic Centre, Riverside, Stafford, ST16 3AQ

The consultation closes at 12 noon on Monday 12 December 2022, comments received after this date may not be considered.

STOFORD

Stafford Borough Local Plan – Preferred Options 2020-2040

Policy 1 Development Strategy and Policy 16 Protection of Employment Land

Landowner – [REDACTED]

Background

Stoford have an option agreement with [REDACTED] sole owners of Redhill Farm, Stone Road, Stafford. A plan is included at **Appendix 1**. Since signing that agreement in 2020, Stoford prepared and submitted a detailed planning application for 28.92ha of land to the west of the A34. A new regional warehouse facility for Pets at Home was developed following detailed planning permission being secured in January 2021. The premises are in the final stages of fit out and will be operational by the turn of 2023.

Policy Comments

Policy 1 (Table 2) identifies the sources of employment land supply that supports the overall Development Strategy. Existing commitments are listed as totalling 108.52ha and these in turn are detailed within Appendix 7 of the Plan. Appendix 7 of the Local Plan lists Land off the A34 North at Redhill, Stone Road, Stafford as 28.96ha of land, under planning application reference number 20/33137.

The Pets at Home facility occupies the majority of the 28.92ha of land, as can be seen on the approved Site Layout Plan at **Appendix 2**. The northern part of the committed site (circa 2.3ha) remains available for development, and through discussions since January 2021, we have explored the potential to deliver a further 128,000 sqft/11,891 sqm of floorspace within the B1/2/8 Use Class. A Management Company set up by Stoford, owns the land where the access road is located. A plan of this potential development is included at **Appendix 3**.

As an experienced developer, and having already delivered 680,000 sqft/ 63,212 sqm (GEA) on site, and with the access road already available, Stoford are poised to prepare and submit an application for the residual part of the 28.96ha committed site.

Stoford therefore **support** the identification of the Cantrill Land immediately north of the Pets at Home facility as an existing employment land commitment (Table 2, and Appendix 7); as an area of land located within the Settlement Boundary (Appendix 2); and as an area of Protected Employment (Policy 16 and also identified on the Proposals Map).

The Pets at Home application area (**Appendix 1 and 2**) confirms that the residual land (that forms part of the supply at Appendix 7) was subject to a range of technical surveys that supported all 28.96ha, including ecology, drainage, landscape, highways and these support the development of the site for employment development without any overriding constraints.

In respect of the Cantrill land to the west of the A34, Policy 1 and 16 are supported with no changes required.

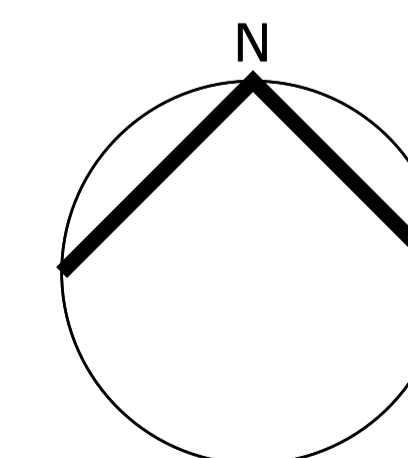
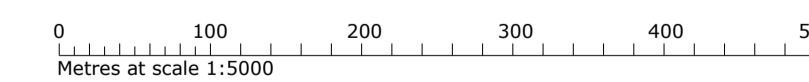
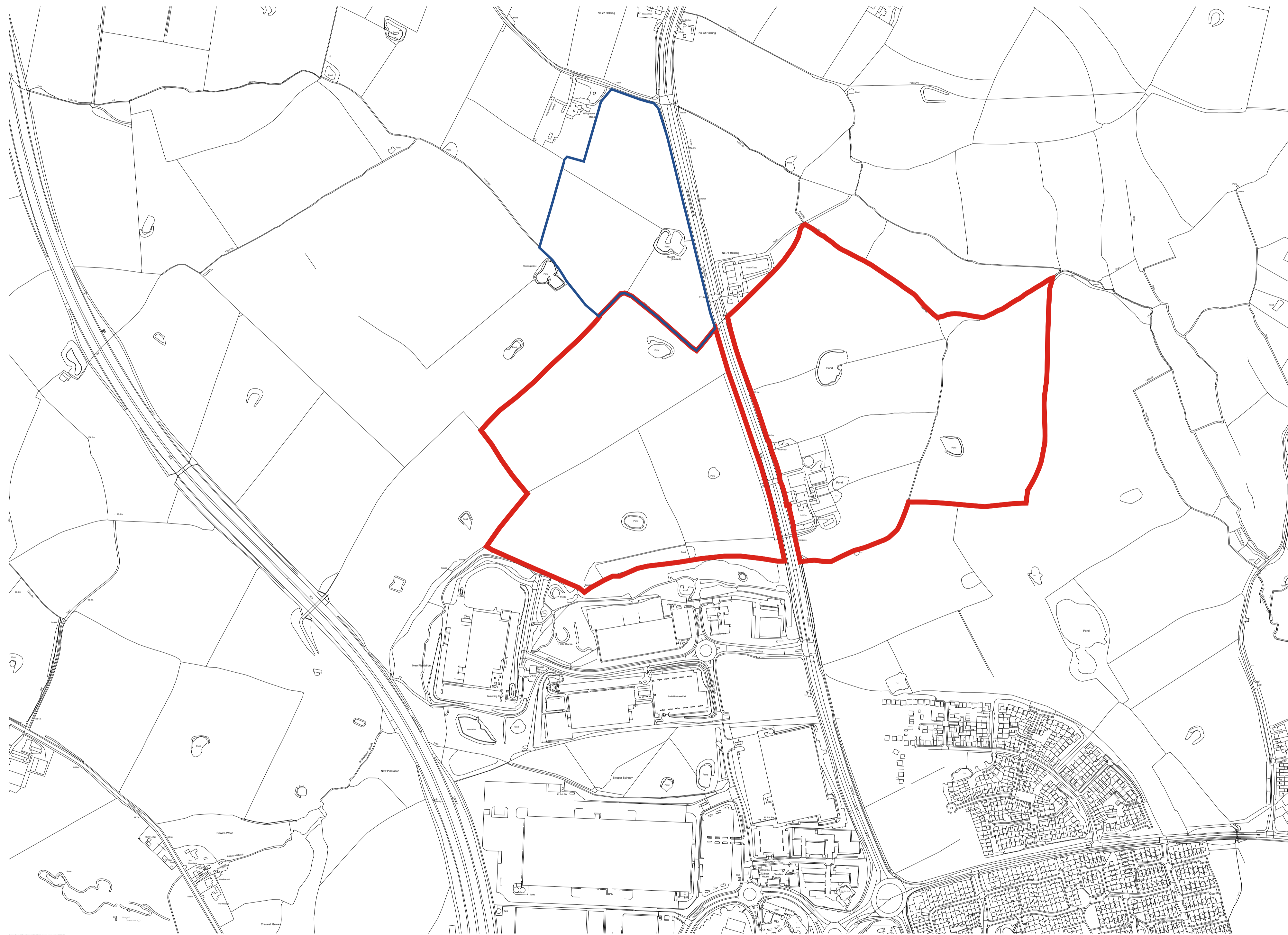
Jo Russell

Planning Director

[REDACTED]

Rev	Date	By	Description
A	06/01/2020	AZ	Boundary line amended;
B	21/01/2020	LA	Blue line added;

- Phases 1 and 2 Area :
53.62 hectares / 132.49 acres
- Land to North West Area :
10.85 hectares / 26.80 acres





Area Name	GIA	GEA
Warehouse	700,472 sq.ft. (65,076 sq.m.)	705,886 sq.ft. (65,578 sq.m.)
Office (3-storeys)	45,291 sq.ft. (4,208 sq.m.)	48,216 sq.ft. (4,479 sq.m.)
Hub Office 1 (2-storeys)	5,665 sq.ft. (526 sq.m.)	6,260 sq.ft. (582 sq.m.)
Hub Office 2 (2-storeys)	5,665 sq.ft. (526 sq.m.)	6,260 sq.ft. (582 sq.m.)
Recycling Unit	10,000 sq.ft. (929 sq.m.)	10,612 sq.ft. (986 sq.m.)
Tote Store	3,000 sq.ft. (279 sq.m.)	3,219 sq.ft. (299 sq.m.)
Gatehouse	273 sq. ft. (25 sq.m.)	387 sq.ft. (36 sq.m.)
Total	770,366 sq.ft. (71,569 sq.m.)	780,840 sq.ft. (72,542 sq.m.)
Canopy 1 (excl. CAT B)	-	16,276 sq.ft. (1,512 sq.m.)
Canopy 2	-	16,919 sq.ft. (1,572 sq.m.)
Canopy 3	-	16,095 sq.ft. (1,495 sq.m.)
Total Canopies	-	49,290 sq.ft. (4,579 sq.m.)
Total Canopies (incl. CAT B)	-	52,707 sq.ft. (4,897 sq.m.)

Rev	Date	By	Description	Page
A	27.08.2020	mjm	Site layout revised to accommodate new roundabout size / location and general update of consultant information	60
B	15.08.2020	mjm	Minor updates to reflect Client & Police Liaison comments, provisional traffic calming shown, revisions to civil and landscape proposals	
C	15.08.2020	mjm	Further landscape revisions	
D	16.09.2020	mjm	EV charging points shown	
E	22.09.2020	mjm	Updates to planning boundary definition and extent	
F	22.10.2020	JS	Added 8 Dock Doors	
G	03.11.2020	JS	Acc. Spaces, Car share, Cycle Shelters amended	
H	24.11.2020	JS	Grid Layout Amended, Trees added and Cycleway Amended	
J	27.11.2020	mjm	Red line revised	
K	10.01.2022	JS	Perimeter footpath amended and landscaping updated	
L	18.01.2022	mjm	S278 data updated (eastern cycle access)	

Car Share Space
Electric Charging Space

SGP
Architects + Masterplanners

Stafford North Business Park

Drawing Name:
Proposed Site Plan
770K Unit

Drawing Stage: PLANNING

Suitability: S2 - Information

SGP File Ref: 19-138-SGP-STE-00-DR-A-131001

19-138 06/07/2020 AZ JN 1:1250 @ A1 L

SGP Project No. Date: Drawn: Team: Scale: Rev

Drawing Number: 19-138 - SGP-STE 00 - DR - A - 131001

Project Code Originator Volume Level Type Role Number

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Car Share Space
Electric Charging Space



Stafford North Business Park

Drawing Name: Proposed Site Plan 770K Unit						
Drawing Stage:	PLANNING					
Suitability:	S2 - Information					
SGP File Ref:	19-138-SGP-STE-00-DR-A-131001					
19-138	06/07/2020	AZ	JN	1:1250	@ A1	L
SGP Project No.	Date	Drawn	Team	Scale	Rev	
Drawing Number: 19-138 - SGP-STE 00 - DR - A - 131001						
Project Code	Originator	Volume	Level	Type	Role	Number

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