

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

**Statutory Bodies and
Stakeholders**

Consultation Period: 24 October - 12 December 2022

Published: February 2023

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From: Preferred Options Consultation [REDACTED]
Sent: 12 December 2022 10:56
To: Strategic Planning Consultations
Subject: Preferred Options Consultation - Submitted Response

Full name: **Alison Horton**

Email: [REDACTED]

Statutory Bodies and Stakeholders

Organisation or Company: **Adbaston Parish Council**

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: **The initial idea of a garden community sounds great. However, it appears on further investigation that further work is required. Adbaston Parish Council supports Eccleshall Parish Council with their recommendations/comments.**

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:

No reply

From: Preferred Options Consultation [REDACTED]
Sent: 09 December 2022 11:05
To: Strategic Planning Consultations
Subject: Preferred Options Consultation - Submitted Response

Full name: **Alison Horton**

Email: [REDACTED]

Statutory Bodies and Stakeholders

Organisation or Company: **Adbaston Parish Council**

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

Added to database: [REDACTED]

Topics (Contents page): **Design and Infrastructure Policies**

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: **Not asked**

Comments: **Not asked**

Site Allocation Policies

Q4 - Do you agree with the proposed allocations?

Policy 9 (North of Stafford): **Not asked**

Comments: **Not asked**

Policy 10 (West of Stafford): **Not asked**

Comments: **Not asked**

Policy 11 (Stafford Station Gateway): **Not asked**

Comments: **Not asked**

Policy 12 (Other housing and employment land): **Not asked**

Comments: **Not asked**

Site Allocation Policies (continued)

Q5 - Do you agree with the proposed allocations?

Policy 13 (Local Green Space): **Not asked**

Comments: **Not asked**

Policy 14 (Penk and Sow): **Not asked**

Comments: **Not asked**

Policy 15 (Stone Countryside): **Not asked**

Comments: **Not asked**

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: **Not asked**

Comments: Not asked

Q7 - The Stafford Borough Plan proposes policies around the town centres uses, agriculture and

forestry development, tourism development and canals. Do you agree? **Not asked**

Comments: **Not asked**

Housing Policies

Q8 - The local plan proposed a policy (23) on affordable housing. Do you agree? **Not asked**

Comments: **Not asked**

Q9 - The local plan proposes a policy (30) to help meet identified local need for pitches for Gypsies and Travellers. Do you agree? **Not asked**

Comments: **Not asked**

Q10 - The local plan proposes policies around homes for life, rural exception sites, new rural dwellings, replacement dwellings, extension etc. Do you agree? **Not asked**

Comments: **Not asked**

Design and Infrastructure Policies

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

Comments: **Consider improving the existing electronic communications to those in the Borough who currently have poor electronic communications.**

Environment Policies

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

Comments: **No reply**

Connections

Q13 - Do you agree with policies? **Yes**

Comments: **Consider public transport links for the people in outlying parishes such as Adbaston who have no public transport link. Consider the bus timetable linking to the train timetable to key places such as Manchester, Liverpool, Birmingham etc. Consider the new train station at Meecebrook being able to service the south of the country, as well as the north. Consider making the route from Eccleshall to Market Drayton via Bishops Offley an official cycle route**

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

From: [REDACTED]
Sent: 09 December 2022 15:20
To: Strategic Planning
Subject: Stafford Borough Local Plan 2020-2040 - Preferred Options Consultation
Attachments: Stafford Borough Local Plan 20-40 response 9.12.22.pdf

Good afternoon

Please find attached Berkswich Parish Council's response to the above consultation.

Kind regards, Sue

Sue Fullwood
Clerk/Responsible Financial Officer
Berkswich Parish Council

[REDACTED]

[REDACTED]

www.berkswichpc.co.uk

[REDACTED]



BERKSWICH PARISH COUNCIL

SERVING THE VILLAGES OF
MILFORD AND WALTON ON THE HILL

THE GATEWAY TO CANNOCK CHASE



9 December 2022

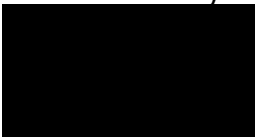
Strategic Planning
Stafford Borough Council
Civic Centre
Riverside
Stafford
ST16 3AQ

Dear Sir or Madam

Stafford Borough Local Plan 2020 – 2040 - Preferred Options Consultation

Berkswich Parish Council discussed the Local Plan at its meeting on 6 December 2022 and have no comment overall on the content of the draft plan. The Council welcomes the designation of Hollybush Field and the coppice at Bluebell Hollow as Local Green Space.

Yours faithfully



Sue Fullwood
Clerk/Responsible Financial Officer

From: Wendy Bannerman [REDACTED]
Sent: 12 December 2022 11:51
To: Strategic Planning Consultations
Subject: Stafford BC LP Preferred Options Consultation Response - The British Horse Society
Attachments: Stafford BC LP Preferred Option Consultation-Response-Form BHS Dec 2022.docx

Dear Strategic Planning and Placemaking
Please see the completed consultation form attached.
Kind regards

Wendy Bannerman
Access Field Officer West and East Midlands

The British Horse Society

[REDACTED]

Telephone: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED]

Website: www.bhs.org.uk

Right now, hundreds of horses are being rescued from a life of mistreatment, cruelty, and neglect. Our Second Chance project rehomes horses who have suffered an unhappy past, giving them a second chance to rest, recover and rediscover a better life at one of our BHS Approved Centres. Our centres are home to BHS-qualified professionals who are equipped with the understanding, patience, skills, and knowledge needed to assist and rehabilitate those horses in desperate need.

Without your help and our brilliant riding schools, these horses face an uncertain future.

Donate today to help give neglected horses a second chance [here](#).



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Contact Details

Full name (required):

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):

Tick the box that is relevant to you:

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

- Under 18
- 18-24
- 25-34
- 35-44
- 45-54
- 55-64
- 65+
- Prefer not to say / not applicable

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

- Yes
- No

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 / No

Policy 1 Comments:

The Visitor economy is highlighted. Equestrian tourism is a growing sector, with horse owners visiting locations for competitions, training and holidays. The proximity of Cannock Chase and centres such as South Staffordshire College, Ingestre and Rockstar Equine makes the area attractive to equestrians and the range of services eg vet, farrier and products eg feed, saddlery required. The equine economy is significant with 10,072 horses registered within the borough (DEFRA,2021) generating a contribution of £55,879,456 per annum. New developments should provide opportunities to improve and extend the bridleway and byway network for the shared enjoyment of equestrians, cyclists and pedestrians. 'Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users' (NPPF, s100).

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

Yes / No

Policy 2 Comments:

Where there are existing Public Rights of Way with equestrian access, eg Bridleway Stafford 39, these must be protected and remain in appropriate condition for use. Where there are limited PRoW currently eg Meecebrook, new developments should enhance the network by providing shared multi-user routes to include equestrians in any off-road provision.

Policy 3. Development in the open countryside - general principles

Yes / No

Policy 3 Comments:

Comments in policies 1 and 2 above apply as these relate to 'recreation uses appropriate to a rural location' and essential infrastructure':

The Visitor economy is highlighted. Equestrian tourism is a growing sector, with horse owners visiting locations for competitions, training and holidays. The proximity of Cannock Chase and centres such as South Staffordshire College, Ingestre and Rockstar Equine makes the area attractive to equestrians and the range of services eg vet, farrier and products eg feed, saddlery required. The equine economy is significant with 10,072 horses registered within the borough (DEFRA,2021) generating a contribution of £55,879,456 per annum.

New developments should provide opportunities to improve and extend the bridleway and byway network for the shared enjoyment of equestrians, cyclists and pedestrians. 'Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users' (NPPF, s100).

Where there are existing Public Rights of Way with equestrian access, eg Bridleway Stafford 39, these must be protected and remain in appropriate condition for use. Where there are limited PRoW currently eg Meecebrook, new developments should enhance the network by providing shared multi-user routes to include equestrians in any off-road provision.

Policy 4. Climate change development requirements

Yes / No

Policy 4 Comments:

Additional consideration in design would be to reduce use of non-environmentally friendly materials for shared multi-user paths for non-MPV;s including equestrians. Natural surfaces or use of recycled materials such as bound rock rubber crumb provide an appropriate surface and lessen environmental impact.

Policy 5. Green Belt

Yes / No

Policy 5 Comments

None

Policy 6. Neighbourhood plans

Yes / No

Policy 6 Comments:

None

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?

Yes / No

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:

Policy 7.

G, I and J: Where there are plans for cycle lanes or walking and cycling paths, equestrians should be included to make these multi-user routes otherwise the scenario is horses become sandwiched between MPV traffic on one side and cyclists on the other. Between 29.02.2020 – 28.02.2021, 1,010 road incidents involving horses have been reported to The British Horse Society. Nationally equestrians have just 22% of the rights of way network and are increasingly forced to use busy roads to access them.

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:

F and G: Where there are plans for cycle lanes or walking and cycling paths, equestrians should be included to make these multi-user routes otherwise the scenario is horses become sandwiched between MPV traffic on one side and cyclists on the other. Between 29.02.2020 – 28.02.2021, 1,010 road incidents involving horses have been reported to The British Horse Society. Nationally equestrians have just 22% of the rights of way network and are increasingly forced to use busy roads to access them. Active travel does include equestrians. Jesse Norman in House of Commons debate on Road Safety, 5 November 2018: “We should be clear that the cycling and walking strategy may have that name but is absolutely targeted at vulnerable road users, **including horse-riders**”.

Policy 10. West of Stafford

Yes / No

Policy 10 Comments:

I, J, K: Where there are plans for cycle lanes or walking and cycling paths, equestrians should be included to make these multi-user routes otherwise the scenario is horses become sandwiched between MPV traffic on one side and cyclists on the other. Between 29.02.2020 – 28.02.2021, 1,010 road incidents involving horses have been reported to The British Horse Society. Nationally equestrians have just 22% of the rights of way network and are increasingly forced to use busy roads to access them. Active travel does include equestrians. Jesse Norman in House of Commons debate on Road Safety, 5 November 2018: “We should be clear that the cycling and walking strategy may have that name but is absolutely targeted at vulnerable road users, including horse-riders”. BW Stafford 39 and NCN 55 are within this area. Sustrans have a Paths for Everyone commitment therefore the route would need to be accessible for equestrians also to link with the bridleway network.

Policy 11. Stafford Station Gateway

Yes / No

Policy 11 Comments:

Where there are plans for cycle lanes or walking and cycling paths, equestrians should be included to make these multi-user routes otherwise the scenario is horses become sandwiched between MPV traffic on one side and cyclists on the other. Between 29.02.2020 – 28.02.2021, 1,010 road incidents involving horses have been reported to The British Horse Society. Nationally equestrians have just 22% of the rights of way network and are increasingly forced to use busy roads to access them. Active travel does include equestrians. Jesse Norman in House of Commons debate on Road Safety, 5 November 2018: “We should be clear that the cycling and walking strategy may have that name but is absolutely targeted at vulnerable road users, including horse-riders”. BW Stafford 39 and NCN 55 and 5 are within this area. Sustrans have a Paths for Everyone commitment therefore the route would need to be accessible for equestrians also to link with the bridleway network.

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:

Gnosall: There are 625 horses registered just in the ST20 postcode area. PRow including bridleways Haughton 49, Gnossal 89, Haughton SO1494(a)(b) and multi-user route NCN 55 are in the vicinity, therefore impact on use and safe access of these essential links to the wider network for all users including equestrians, must be included in development plans. The impact of increased MPV traffic on the rural network is also of concern.

Woodseaves: There are 625 horses registered just in the ST20 postcode area. PRow including bridleways High Offley 1, Gnosall 1, High Offley 30 are in the vicinity, as well as country lanes and UCR's, therefore impact on use and safe access of these essential links to the wider network for all users including equestrians, must be included in development plans. The impact of increased MPV traffic on the rural network is also of concern.

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.

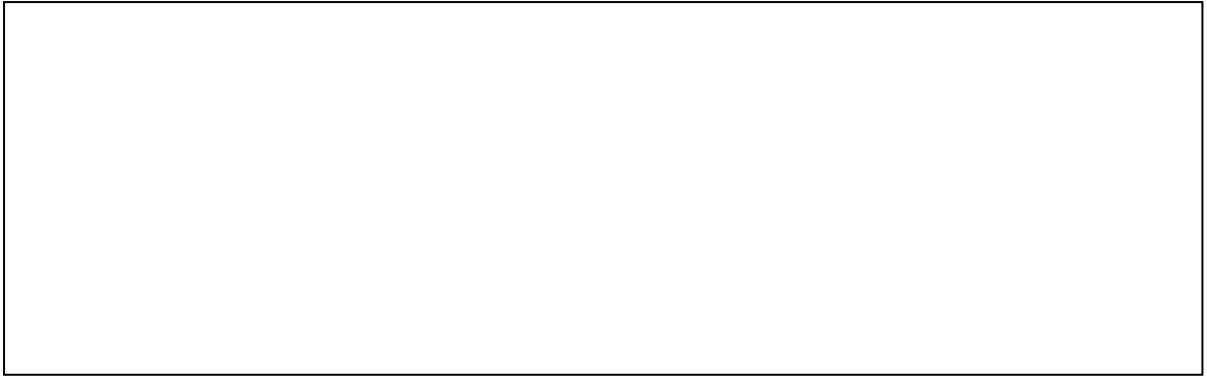
Local Plan Preferred Options document reference: Pages 56 to 59 and appendix 2.

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:

The Penk and Sow Parklands should include equestrian access. Nationally equestrians have just 22% of the rights of way network and are increasingly forced to use busy roads to access them. Additional permissive or dedicated paths mitigate the increasing risks of riding on the roads. There are many examples of Country Parks successfully including equestrians on shared paths. Eg Fosse Meadows, Leicestershire, Shipton Country Park, Derbyshire, etc.

Policy 15. Stone Countryside Enhancement Area

Yes / No

Policy 15 Comments:

The Stone Countryside Enhancement Area should include equestrian access. Nationally equestrians have just 22% of the rights of way network and are increasingly forced to use busy roads to access them. Additional permissive or dedicated paths mitigate the increasing risks of riding on the roads. There are many examples of Country Parks successfully including equestrians on shared paths. Eg Fosse Meadows, Leicestershire, Shipton Country Park, Derbyshire, etc.

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 / No

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:

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:

Policies 36, 37: New developments should provide opportunities to improve and extend the bridleway and byway network for the shared enjoyment of equestrians, cyclists and pedestrians. 'Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users' (NPPF, s100). Infrastructure design should include equestrian access. The policy states that design will provide for 'inclusive access, safety and ease of future maintenance' therefore it is expected that environmentally sound materials would be used to ensure all non-MPV users including equestrians can enjoy the use of paths and links to the wider off-road network safely. Natural surfaces, appropriate specified crushed stone or alternatives such as bound rock rubber crumb are suitable for all user groups.

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:

Policy 42, 43: Where PRoW and wider off-road provision may be affected by increased surface water due to development, how will developers protect public access and ensure damage to surfaces are mitigated?

Policy 46: it is positive to see horse-riding included in 'creating and improving connectivity'. According to BETA two-thirds of equestrians are women and Church et al (2010) found 37% of women who are horse riders are over 45 years of age and over a third would pursue no other physical activity. Horse-riding constitutes 'moderate exercise' according to the Government. Any newly constructed paths should be integrated/physically linked with the existing public rights of way network where possible and needed, clearly waymarked and recorded on either the definitive map or another publicly accessible map as appropriate.

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:

Whilst it is encouraging to see that PRoW and access will be protected and may be enhanced, disappointingly, there is no mention of horse riding or carriage driving in policies 52 and 53. Active travel does include equestrians. Jesse Norman in House of Commons debate on Road Safety, 5 November 2018: "We should be clear that the cycling and walking strategy may have that name but is absolutely targeted at vulnerable road users, including horse-riders". Where there are plans for cycle lanes or walking and cycling paths, equestrians should be included to make these multi-user routes otherwise the scenario is horses sandwiched between MPV traffic on one side and cyclists on the other. According to BETA two-thirds of equestrians are women and Church et al (2010) found 37% of women who are horse riders are over 45 years of age and over a third would pursue no other physical activity.

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.

This response is from the British Horse Society however our volunteers in the county may also respond at a local level.
New developments should provide opportunities to improve and extend the bridleway and byway network for the shared enjoyment of equestrians, cyclists and pedestrians. 'Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users' (NPPF, s100). The BHS has further information relating to the provision of accessible off-road paths via <https://www.bhs.org.uk/go-riding/leaflets-and-downloads/>

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.

From: Preferred Options Consultation [REDACTED]
Sent: 24 October 2022 09:28
To: Strategic Planning Consultations
Subject: Preferred Options Consultation - Submitted Response

Full name: **CHRIS THOMAS**

Email: [REDACTED]

Agents and Developers

Organisation or Company: **BRITISH SIGN AND GRAPHICS ASSOCIATION**

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

Added to database: [REDACTED]

Topics (Contents page): **Design and Infrastructure Policies**

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: **Not asked**

Comments: **Not asked**

Site Allocation Policies

Q4 - Do you agree with the proposed allocations?

Policy 9 (North of Stafford): **Not asked**

Comments: **Not asked**

Policy 10 (West of Stafford): **Not asked**

Comments: **Not asked**

Policy 11 (Stafford Station Gateway): **Not asked**

Comments: **Not asked**

Policy 12 (Other housing and employment land): **Not asked**

Comments: **Not asked**

Site Allocation Policies (continued)

Q5 - Do you agree with the proposed allocations?

Policy 13 (Local Green Space): **Not asked**

Comments: **Not asked**

Policy 14 (Penk and Sow): **Not asked**

Comments: **Not asked**

Policy 15 (Stone Countryside): **Not asked**

Comments: **Not asked**

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: **Not asked**

Comments: Not asked

Q7 - The Stafford Borough Plan proposes policies around the town centres uses, agriculture and

forestry development, tourism development and canals. Do you agree? **Not asked**

Comments: **Not asked**

Housing Policies

Q8 - The local plan proposed a policy (23) on affordable housing. Do you agree? **Not asked**

Comments: **Not asked**

Q9 - The local plan proposes a policy (30) to help meet identified local need for pitches for Gypsies and Travellers. Do you agree? **Not asked**

Comments: **Not asked**

Q10 - The local plan proposes policies around homes for life, rural exception sites, new rural dwellings, replacement dwellings, extension etc. Do you agree? **Not asked**

Comments: **Not asked**

Design and Infrastructure Policies

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

Comments: **Policy 34(1) requires that development proposals “shall accord with the National Design Code, National Design Guide and any local design code”. We accept that proposals should accord with the National Design Guide. However, the National Design Code is advice to local authorities, establishing suggested parameters within which they may produce their own design guidance. It is not a document which, in itself, gives any advice on potential development proposals. The reference to “National Design Code” should therefore be deleted, since it is misleading. We do not accept that development proposals “shall accord with any local design code”. Local design codes are invariably advice which may be adopted by local authorities in a form such as a SPG, SPD, AAP or any other number of identifying names. Crucially, these documents are invariably adopted without independent scrutiny (although they may be subject to public consultation). But they do not have the force of adopted policy which has been independently scrutinised (usually by a Planning Inspector). Policy 34(1) attempts to apply the weight of adopted planning policy to this sort of supplementary guidance, thereby giving it more weight than it should properly have in consideration of development proposals (where it should be considered as guidance, not as independently scrutinised adopted policy which is subject to the rigorous requirement of section 54A of the Town and Country Planning Act 1990). We accept that development proposals should have regard to local design codes. But this is not the same as “accord with” which is a direction to comply. We therefore suggest that Policy 34(1) should be amended to: Development proposals shall “1. Accord with the National Design Guide and take account of the advice in any local design code;”**

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:

No reply

From: Hazel Smith [REDACTED]
Sent: 09 December 2022 16:56
To: Strategic Planning Consultations
Cc: [REDACTED]
Subject: RE: Stafford Borough Local Plan 2020-2040: Preferred Options consultation
Attachments: Response CRTR-POL-2022-37410.pdf

Hi [REDACTED]

Please find attached the response of the Canal & River Trust to the above consultation.

Should you or your team wish to discuss any aspect of our response please do get in touch in the New Year.

Kind regards

Hazel Smith
MRTPI

Area Planner – Midlands

M [REDACTED]

E [REDACTED]

[REDACTED]



Canal & River Trust

[REDACTED]

canalrivertrust.org.uk



Sign up for the Canal & River Trust e-newsletter canalrivertrust.org.uk/newsletter
<https://canalrivertrust.org.uk/specialist-teams/planning-and-design>



Stafford Borough Council
Civic Centre
Riverside
Stafford
ST16 3AQ

Your Ref Preferred Options
Consultation
Our Ref CRTR-POL-2022-37410

Friday 9th December 2022

Dear [REDACTED],

Proposal: Stafford Borough Local Plan 2020-2040: Preferred Options consultation

Waterways: Shropshire Union Canal (including the Newport Branch Canal), Staffordshire & Worcestershire Canal (including the Stafford Riverway Link) and the Trent & Mersey Canal

Thank you for your consultation.

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a statutory consultee in the Development Management process.

The canal network is a significant historic feature bearing reference to the Borough's part within the industrial revolution. This is now an engrained part of the character, historic environment, and cultural identity of Stafford Borough.

Within the Stafford Borough boundary, the Trust maintains a network of approximately 55km, which includes 15 locks, 92 listed structures, 99 bridges, 10 aqueducts, one tunnel and is made up of parts of three waterways which are designated as Conservation Areas. The Stafford Riverway and Newport Branch Canal provide a further 5.6km of designated and non-designated heritage assets. We also own and manage the Knighton Reservoir on the western border of the Borough that stores and provides water for the canal system to operate.

Our towpath counter at Bridge 74, Mill Lane, Great Haywood on the Trent & Mersey Canal indicates that there can be over 200 daily users of the towpath at this popular rural location during the busy months of July and August, but even during the quieter winter months there can be approaching 50 pedestrians, cyclists and dog walkers using the towpath each day.

The waterways are significant green infrastructure, but also function as blue infrastructure, a sustainable travel resource for commuting and leisure; a natural health service acting as blue gyms and supporting physical and healthy outdoor activity; an ecological and biodiversity resource; a tourism, cultural, sport, leisure, and recreation resource; a heritage landscape; and a contributor to water supply and transfer, drainage and flood management. The waterway network forms part of the historic environment, the character, cultural and social focus of the borough.

Please find below the Trust's response to your draft Development Plan documents. We hope that the comments provided are clear, helpful and that your next revision will address these points. We are willing to continue to work

with you, to meet and discuss these points for clarity and to seek to work together towards high-quality canal environs within your Borough. Please contact me with any queries that you may have, my details are below.

Site Allocation Policies

Policy 14. Penk and Sow Countryside Enhancement Area

This policy fits with our planned Green Flag application for whole of the Staffordshire & Worcestershire Canal, as well as our current HS2 Phase 2a BIF bid for both the Trent & Mersey Canal and the Staffordshire & Worcestershire Canal centred around Great Haywood. The Staffordshire & Worcestershire Canal lies very close to the Sow/Penk confluence. Naming the Trust as a partner in this policy as well as Policy 15 would enable additional collaborative working on mutual goals.

Policy 15: Stone Countryside Enhancement Area

The Trust were recently involved in early-stage plans for the regeneration of Westbridge Park within this proposed allocation. The reasoning for this Countryside Enhancement Area designation has strong links with the Trust's aims and objectives for the Trent & Mersey Canal and aligns with the Green Flag management plans that are in place for this canal between Kidsgrove and Stone. We can share the Stone Green Flag management plan with appropriate Council Officers. We note that the Trust are named in this policy as a partner to enable additional collaborative working on these mutual goals.

Economy Policies

Policy 22: Canals

This policy proposes to replace the existing Local Plan Policy E7 Canal Facilities and New Marinas. We consider that there is opportunity here to enable this policy to do more than just assess "New canal facilities and associated infrastructure" and go beyond that to consider all proposals that have an impact on the canal corridor. We note that the policy already includes reference to protecting the character and attractiveness of the countryside; external lighting to be kept to a minimum and sensitively located; improved public access; maintaining water quality; preventing conflict between user groups; engaging built frontages with the canal; and the restoration and re-use of existing canal buildings, which all fit with the Trust's aims and objectives. However, as the policy is currently set out it only enables the consideration of these factors as they relate to "New canal facilities and associated infrastructure", which we believe may not be the Council's intention given the wording used within the policy.

Currently, the policy has an A category to consider proposals for "New canal facilities and associated infrastructure" and, so the Trust consider it would be possible to consider in more depth the wider implications of "Proposals adjacent to the canal network". This would allow for the criteria listed above to be applied to both categories. Additionally, the material consideration of the protection of the structural stability of our historic canal infrastructure, such as the embankments and cuttings, regularly appears in our responses to planning applications within our notified area, but currently finds little opportunity within local policy to require protective measures as part of the submission. This places a greater onus on conditions which are not the best means of ensuring these matters are fully assessed prior to the commencement of development.

A mixture of mooring types, including both short term and longer-term moorings provides the best balance unless developers can demonstrate otherwise. Trust moorings are used in a number of ways. Long-term moorings (i.e. the parking space for the boat) may be used for leisure purposes or could be someone's primary residence i.e. a residential mooring. Even use for leisure purposes can mean that boaters spend a significant period of time at the mooring location. There are also designated visitor mooring areas i.e. an area used by boaters for mooring whilst on a cruise, including 'continuous cruisers' for whom their boat is their primary residence. In addition to these moorings, the relevant waterway legislation permits casual mooring for up to 14 days at a time by any licensed boat along any length of towpath. The exceptions to this are where the towpath is designated for use by long term

permit holders, the moorings are visitor moorings where the duration of stay has a specific time limit, or the towpath is designated as a 'no mooring' stretch. Casual and visitor mooring can be undertaken by any boat regardless of how it is being used, whether it is a boater on holiday or someone for whom their boat is their primary residence.

All of the canals within the Borough are designated as Conservation Area, with the restoration routes of the Stafford Riverway and Newport Branch Canal being non-designated heritage assets where they do not fall within Conservation Areas. Policy 22 as drafted does not make provision for the protection of the restoration routes from other development, to recognise the economic, social and environmental benefits provided by such routes.

Engaging built frontages with the canal should be supported by site analysis to demonstrate that no harm would be afforded to a protected heritage setting, recreational amenity, or biodiversity. Please also see comment on Policy 41 regarding built frontages.

It would be appropriate for any new moorings proposed to be supported by a minimum level of mooring infrastructure, including power supplies to promote low carbon boating.

We suggest that the policy would be improved by using the following wording for Policy 22 and would welcome further discussion around this policy with the Council prior to the next stage of the consultation process.

POLICY 22. Canals

Proposals adjacent to the canal network will be supported if the following criteria are met:

- 1. Where possible, public access is improved;*
- 2. The development does not have an adverse effect on water quality;*
- 3. It does not create conflicts between different users of the canal, such as pedestrians and recreation users on / by the water;*
- 4. Where the proposal is within a settlement the building fronts the canal rather than turning its back to it;*
- 5. Wherever possible redundant canals and related buildings are protected, restored and re-used;*
- 6. External lighting is kept to a minimum and is sensitively located;*
- 7. Proposals protect the structural stability of canal infrastructure, such as cuttings and embankments; and*
- 8. Where new canal facilities and associated infrastructure are proposed these will be supported where:*
 - i. The proposal is appropriate in scale to its locality;*
 - ii. Where located in the Green Belt, the proposal is consistent with national Green Belt policy;*
 - iii. Adequate provision for short-stay moorings and related facilities is incorporated, where appropriate;*
 - iv. Where the proposal is outside of settlement boundaries:*
 - a. there are no permanent moorings for residential purposes;*
 - b. where the proposal comprises a marina or moorings it has only limited service facilities;*
 - c. it constitutes only uses that it is essential are located in proximity to the canal; and*
 - d. the character and attractiveness of the countryside is protected.*

The supporting text refers to the Trust currently only in relation to short stay moorings along our network. We are unclear how this supports the text of the policy? We have referred to the types of moorings found on our network above. Should you wish to discuss moorings in further depth please do get in touch.

It would be helpful to prospective developers to name the Trust as a partner for canalside development proposals and suggest early pre-application advice is sought directly from us prior to the drafting of plans for submission as a planning application. It would be unusual for any canalside development to not require interaction with us in some way and early collaboration helps all agencies to understand the parameters of a site best. All of the following matters require some form of agreement outside the planning process with the Trust. Whilst we would provide specific advice on these matters during the application process for the benefit of the applicant, the LPA needs to be mindful of these outside considerations in the formulation of Policy 22 against which future applications will be considered. These matters will be material to the form and function of proposals:

- New Marinas Process to assess the water resources necessary to support additional facilities and the resulting increased boat movements along our network. We look at proposals on a case-by-case basis and recommend that the first stage is completed prior to the submission of a planning application. This factor became of concern at the Wedgewood Marina proposal recently. More can be found about this wide ranging and multi-stage process on our webpage <https://canalrivertrust.org.uk/business-and-trade/inland-marina-development-guide>.
- Estates agreements for the creation of new access points to the towpath network. Further details can be found here <https://canalrivertrust.org.uk/business-and-trade/estates>
- Any proposal for the discharge of water to the waterway, abstractions, industrial heating, and pipe/media crossings/easements is likely to require our agreement. Details of the Trust's Surface Water Drainage advice note can be found here <https://canalrivertrust.org.uk/refresh/media/thumbnail/22749-surface-water-drainage-leaflet-august-2015.pdf>
- Our express consent to works on or close to our land may also be required through our Code of Practise. Details on the Code of Practise can be found here <https://canalrivertrust.org.uk/business-and-trade/undertaking-works-on-our-property-and-our-code-of-practice>

We suggest that para. 22.4 is re-phrased for ease of reading: *It is important to note that the entire length of the Trent & Mersey, Shropshire Union and Staffordshire & Worcestershire Canals within the borough are designated as conservation areas.*

Design & Infrastructure Policies

Policy 34. Urban design general principles

This general policy is a useful tool for canalside design; however, care is needed with regard to “well-lit spaces” which could conflict with biodiversity protection and enhancement measures necessary adjacent to our waterways. We recommend that this policy is re-worded to ensure the use of “appropriate lighting design” to “prevent unnecessary artificial light spill”. Our comments on Policies 22 and 46 includes the need to consider the impact of external lighting for all canalside developments.

Policy 35. Architectural design

This general policy is a useful tool for canalside design; however, care is needed with regard to retrofitting biodiversity enhancements to schemes to meet with Biodiversity Net Gain Requirements. It is important to ensure that such enhancements do not detract from the overall design of proposals. Adding wording to require a cohesive approach to such additions would futureproof this policy.

Policy 36. Landscaping design

We note that watercourses should be designed as integrated and expressed elements of the development and its layout, as well as using native species to fit with the Council and the Trust's aims and objectives for supporting good design and biodiversity.

Policy 40. Renewable and low carbon energy

This policy appears mainly centred on wind production of energy, but at B does include wider 'Renewable and low carbon energy infrastructure' Para 40.6 does not include the options of Combined Heat & Power or Hydro-Electric Power within the mentioned sources which would be relevant to canalside developments. See further information here <https://canalrivertrust.org.uk/specialist-teams/planning-and-design/planning-policy/the-values-and-benefits-of-waterways/environmental-wellbeing/sustainable-energy-source>

Environment Policies

Policy 41: Historic Environment

Canals are mentioned in para 41.3 as 'providing attractive leisure walks and routes along the borough's network of historic canals, all of which are designated as linear Conservation Areas.' All of the canals within the Borough are designated as Conservation Area, with the restoration routes of the Stafford Riverway and Newport Branch Canal being non-designated heritage assets where they are not within a Conservation Area.

This policy encompasses many urban design related matters relevant to the canal's context. Within Policy 22: is included the need for a development to provide a canal side frontage. This is encouraged providing that the canal's setting has first been reviewed as suitable for this approach through site analysis to ensure protection.

Policy 43. Sustainable drainage

The disposal of water from development sites is a material consideration that is experiencing increased discussion at a national level due to matters such as nutrient neutrality. The Trust are not a drainage authority and so the disposal of surface water into the canal is only possible in some agreed cases. Early-stage pre-application advice from the Trust on the disposal of water to a canal is recommended. We cannot give "in principle" agreement to this and each site needs to be fully assessed via our mandatory surface water review process. The review considers the quantity, velocity and quality of proposed flows and it should not be assumed that a discharge will be accepted. Details of the Trust's Surface Water Drainage advice note can be found here:

<https://canalrivertrust.org.uk/refresh/media/thumbnail/22749-surface-water-drainage-leaflet-august-2015.pdf>

Policy 44. Landscapes

We consider that the rural canal network provides *'Tranquil areas which have remained relatively undisturbed from noise and are recognised for their recreational and amenity value.....'* You may wish to consider the full wording of this statement for clarity. We consider canals to be tranquil places, even within urban areas, however there is need to also consider the protection of canal boat yards. These vital canal facilities can be detrimentally affected by the "agent of change" and so need protection as vital facilities for the growing boating community.

Policy 46. Green and blue infrastructure network

The Glossary defines the canal network as part of the borough's green blue infrastructure (GBN) and the policy promotes the protection, enhancement and extension of this network. This policy links the size of development with the need to improve access to green and blue infrastructure.

We recommend that where reasonable, appropriate upgrades to the canal towpath can contribute effectively to the sustainable transport connections between settlements. It would be appropriate for the policy to set criteria whereby developer contributions would be expected for improvements. Such works should be mindful of the choice of width and surface material to respect the biodiversity value of the canal corridor. See further information in the response to policy 52.

We consider it will be important for this policy to define the period of ongoing maintenance (defined as 30 years in relation to Biodiversity Net Gain)

- include the use of appropriate lighting design to prevent unnecessary artificial light spill into the GBN
- include appropriate buffers to minimise harm to GBN.

Policy 47: Biodiversity

Biodiversity net gain contributions from developments potentially affecting canals should allow enhancement to our network within the borough, inc. Stone Countryside Enhancement Area and Penk & Sow Countryside Enhancement Area.

Policy 49. Trees

We note the requirement to use native species to fit with the Council and Trust's aims and objectives for supporting biodiversity.

Policy 50. Pollution

This is a very broad policy that aims to protect health, amenity (which is already partly covered by Policy 32) and the environment. We suggest that the policy be re-named Environmental Protection and ideally this should be standalone to focus solely on mitigating the impacts to the environment. Human health and wellbeing are environmental considerations.

We are concerned that the wording of policy 50 isn't strong enough given the severity of the impacts pollution can have on our network. Part A has the wording of "unacceptable harm" which is subjective and open to differing interpretations by the different agencies and landowners involved in the planning process. Likewise, Part B refers to proposals only being permitted if they can provide a "high standard of protection" for environmental quality which is again subjective.

We regularly respond to planning proposals where Construction Environmental Management Plans (CEMP) are generic and fail to include the bespoke mitigation measures necessary to provide a high standard of protection to our network. We request that para 50.3 is amended to include CEMPs as a required document to enable construction pollution risks to be fully considered.

The wording of Part A with the inclusion of instability at the end is currently worded awkwardly. We would suggest the following wording would be easier to interpret through the removal of the second 'or'.*environment through air (including odour), water, noise or light pollution, vibration, insects or vermin, contamination or land instability.*

Policy 52. Transport

Prioritising sustainable travel is an aim of the Trust and the inclusion of non-highway based infrastructure within the borough's network is important. Our towpath network connects settlements, and potentially new developments to those settlements. With sustainable travel a main objective of the plan and this policy, and we consider that our 55km of towpath network within the Borough can contribute to this objective.

Improvements to the towpath surfacing (type appropriate to the location) and wayfinding would be beneficial to the health and active transport networks along the following lengths of canal (but not limited to these) within the borough:

- Shropshire Union Canal - Access/surfacing improvements of towpath and links into Gnosall village, of the towpath through the village and at the junction with The Way of the Millennium (Stafford - Newport Greenway).
- Trent & Mersey Canal - Towpath south of Stone through Great Haywood and to connect through to the improvements occurring at Rugeley; improved access and wayfinding associated with Meaford Power Station site.
- Staffordshire & Worcestershire Canal - Potential to link into the Black Country settlements with improved surfacing and wayfinding south of the planned upgrades between Great Haywood and Milford.

Towpaths can be excellent routes for active travel, but they are towpaths, not dedicated cycleways. It is vital that we always consider all user groups and other considerations including wildlife and heritage. With this in mind there is never a "one size fits all" approach and we always need to consider local factors. Many canals were constructed 200+ years ago. They were industrial transport routes and not built with modern accessibility needs in mind.

In any scheme it is always important to consider if and how access can be improved, but there are often practical limitations that mean solutions are imperfect. The towpath of the Trent & Mersey Canal north of Stone all the way through to Stoke is generally in good condition, but improvements have been requested via the proposals at Meaford Power Station. Stone itself has a very high-quality sealed surface which is appropriate for that section,

but that character of surface is not appropriate for the whole network, nor is the same width available, particularly on the Shropshire Union.

The surfacing choice for each section to be improved needs to not spoil the character of the rural landscape or be detrimental to habitat, drainage, use of raw materials etc. We have identified that the Trent & Mersey Canal is in general better suited to a wide path than the Shropshire Union as it is better connected with population centres. Ideally, a “Centrack” type surface would be most appropriate. We have already installed this style of surface through Rugeley and have other schemes lined up towards Armitage and then further east around Kings Bromley, Fradley and Burton.

As above, should you wish to meet to discuss how the Trust could work with the Council towards joint aims or queries about the above response please don't hesitate to contact me.

Yours sincerely,

Hazel Smith MRTPI
Area Planner – Midlands



<https://canalrivertrust.org.uk/specialist-teams/planning-and-design>



From: Banbury, Julia (E,I&S) [REDACTED]
Sent: 08 December 2022 17:22
To: Strategic Planning Consultations
Cc: [REDACTED]
Subject: Plan for Stafford Borough - Preferred Options consultation - AONB response
Attachments: SBC Local Plan 2020-2040 Preferred Options consultation response.docx

Apologies if you have received a version of this with a Draft Watermark

Please find attached the AONB response to the above consultation.

Kind regards
Julia



Julia Banbury AONB Landscape Planning
Officer

[REDACTED]
[REDACTED]
[REDACTED]
Mobile: [REDACTED]

Email: [REDACTED]

www.cannock-chase.co.uk/

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Cannock Chase AONB Partnership

Website: <https://cannock-chase.co.uk/>

Email: [REDACTED]
Please ask for: [REDACTED]

Date: 8th December 2022

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

Dear Sirs

Draft Stafford Borough Local Plan 2020 – 2040: Preferred Options consultation

Thank you for consulting Cannock Chase Area of Outstanding Natural Beauty (AONB) Partnership. The comments on behalf of the Cannock Chase Area of Outstanding Natural Beauty (AONB) Joint Committee are set out below.

As you are aware, the AONB is a statutory designated area under the Countryside and Rights of Way Act 2000 (CROW). CROW places a duty on all public bodies to “..have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty..”. The Cannock Chase AONB Management Plan, prepared in accordance with CROW, sets out how the AONB will be conserved and enhanced.

NPPF paragraph 174 states that planning policies should ‘protect and enhance valued landscapes’, whilst paragraph 176 states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and AONBs, and that the conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas.

The Cannock Chase [AONB Management Plan 2019 – 2024](#), and its supporting documents provide a strategic context for the AONB, and should be used to inform the evidence base and policy for the Development Plan to ensure that the law and policy in respect to AONBs is properly applied.

The Cannock Chase AONB Partnership has a duty to advise on planning matters, as set out in the AONB Planning Protocol. The Partnership’s focus is on ensuring that the special qualities of the AONB are recognised, protected and enhanced in all development plans.

Q2. Development Strategy and climate change response

Policy 1 Development Strategy and Stafford settlement strategy

Cannock Chase AONB is a nationally protected landscape and in recognition of that fact it should feature on the Stafford Borough Key Diagram shown on page 26.

Stafford Settlement Strategy, page 27, makes no mention of the conservation and enhancement of the AONB, nor is it shown on Stafford Key Diagram on page 30. We welcome the requirement that residential development should not damage Cannock Chase SAC. The protected landscapes of the AONB are also a critical part of the Borough's rich natural environment. The AONB boundary is less than 1km from the edge of Stafford; less than 400m from the edge of Walton-on-the-Hill, therefore development to the west or south of these settlement boundaries would be in the immediate setting of the AONB and would have potential for detrimental impact on the AONB. Reference to avoiding detrimental impacts, and conserving and enhancing Cannock Chase AONB, and its setting, for its landscape and natural beauty and the services it provides indirectly as a result of its special qualities is sought.

Policy 4. Climate Change

Cannock Chase AONB has carried out a greenhouse gas emissions assessment for the AONB and set out a proposed pathway to get to net zero by 2034. The pathway includes challenging targets, for example, planting 10 hectares of new woodland every year together with a range of other interventions. The various climate change related policies set out in the plan, for example, 14, 15, 40, 42, 43, 46, 52 and 53 are welcomed in their intent, and need to be considered in relation to the contribution they could make to the AONB's climate change ambitions.

Policy 5 Green Belt

Policy is supported.

Question 3 Meecebrook Garden Community

Policy 7 is supported. Part I of this policy refers to green infrastructure, new habitats and open space provision. Whilst the location is some distance from the AONB, high quality green infrastructure on the site can support AONB Management Plan Policies that seek to reduce negative impacts of recreational pressure in the AONB and enhance climate and biodiversity resilience across the wider landscape.

Q. 4 Site allocations

Policies 9, 10, 11 and 12 are supported.

Q.5 Green Space and Countryside Enhancement Areas

Policy 13, 14 and 15 are supported. Policy 14 is warmly welcomed. The Penk and Sow Countryside Enhancement Area could provide a potentially important ecological link between Stafford and the AONB, but no mention is made of this relationship or how the Enhancement Area could complement and enhance the AONB and contribute to policies and actions in the AONB Management Plan.

Q.11 Design and infrastructure

Policy 40 Renewable and Low Carbon Energy

This policy includes allocation of a potential site for solar development adjacent to Brancote Farm, Tixall, approximately 1km from the AONB. The site does not appear to have had a Landscape Sensitivity Site Assessment.

Potential allocation is of concern to the AONB, due to its proximity to the AONB boundary, relatively elevated position, and weak existing hedgerow structure, which potentially leaves the site open to views. Whilst solar panels are normally relatively low level, there is potential for visual intrusion such as due to glare from panels and from taller structures such as substations. According to the AONB Views and Setting Guide, theoretically development would be visible from the AONB (Viewpoint 19). There are likely to be other views of the site, including direct views across the Sow valley from parts of Milford. Mitigating views towards upper site elevations may not be feasible. Such an allocation should only be made if the Authority is confident that potential impacts on the AONB could be mitigated. Further assessment by the Authority is sought prior to allocation.

Your attention is drawn to AONB Management Plan Policy LCP8: Development and land management proposals in the area, which by virtue of their nature, size, scale, siting, materials or design can be considered to have a negative impact on the natural beauty and special qualities of Cannock Chase AONB, should be resisted.

Q12 Environmental Policy

NPPF emphasises that planning policies should conserve and enhance all of the special qualities of AONBs – landscape, scenic quality, wildlife and cultural heritage. Policy 45 should be re-worded to reflect this.

Reference in Paragraph 45.1 to the AONB Views and Settings Guide 2020. The AONB also has a Design Guide (2020), prepared in response to AONB Management Plan Policy LCP1 Reference to the AONB Design Guide would be warmly welcomed in Para 45.1 to support the Policy 45A and give weight to the guide in the planning process.

Q15 Evidence Base

Two possible housing allocations close to the AONB have not been included as preferred options (BER02 – Walton-on-the-Hill and BER04 – Land north of Milford Road). This is welcomed as the AONB would have serious concerns regarding the allocation of these sites. Evidence in the AONB Views and Setting Guide indicates that both these sites would be visible from the AONB therefore development would lead to detrimental impacts.

I trust you can take these comments into consideration

Yours sincerely



Julia Banbury MA CMLI
AONB Landscape Planning Officer

From: [REDACTED]
Sent: 09 December 2022 15:14
To: Strategic Planning Consultations; SPP Consultations; Strategic Planning
Cc: [REDACTED]
Subject: RE: Stafford Borough Local Plan 2020-2040: Preferred Options consultation
Attachments: Cannock Chase District Council response to SBC PO Dec 2022.pdf

Dear [REDACTED],

Please find attached the response on behalf of Cannock Chase District Council.
Please can you send an acknowledgement of receipt.

Kind regards,
Heidi



Strategic Planning and Placemaking manager
Stafford Borough Council
Civic Centre
Riverside
Stafford
ST16 3AQ

9.12.22

Dear Sir,

Stafford Borough Local Plan 2020-2040: Preferred Options stage Consultation

Please see below comments in response to Stafford Borough Council's consultation on the Stafford Borough Local Plan 2020-2040: Preferred Options document.

Cannock Chase District notes the level of provision of housing and employment land within Stafford Borough administrative boundary. No objections are raised to the higher levels of provision proposed. Cannock Chase Council notes at para 1.3 'that the development strategy also allows for 2,000 homes as a contribution to meeting unmet need of other authorities in the region. These homes are the subject of ongoing negotiations with other regional authorities.'

Cannock Chase District Council have previously contacted Stafford Borough to advise you that we were unable to meet our housing need and employment need without releasing sites from within the Green Belt and asked if you were able to assist us in meeting this shortfall. At the time you advised that you were unable to assist. Your current Preferred Options document states that you have a surplus of housing and employment land and as a neighbouring authority and Duty to Cooperate partner, Cannock Chase District Council would like to be included in the discussions directly with regard to any distribution of the surplus.

In addition, in relation to Policy 40 and the site shown on the Policies Map for photovoltaic solar generation to the north of Rugeley. I consider Policy 40 contains insufficient safeguards at present and insufficient site-specific assessment has taken place on the potential impact of a photovoltaic solar generation site to the north of Rugeley given that the site is adjacent to the AONB, SSSI and SBI to enable the certainty given in Policy 40 that the site will be supported in principle for this use.

Cannock Chase supports the approach taken with regard to the Cannock Chase SAC and supports the continued partnership working through the Cannock Chase SAC Partnership.



We look forward to continued engagement to resolve the above matters and meet the requirements of the Duty to Cooperate to assist with the progression of both the Cannock Chase District Local Plan and the Stafford Borough Local Plan.

For further discussions, please contact [REDACTED] or Heidi Hollins, interim planning policy manager.

Yours faithfully,

Sushil Birdi
Planning Services Manager



From: [REDACTED]
Sent: 06 December 2022 15:26
To: Strategic Planning
Cc: [REDACTED]
Subject: Chebsey Parish Council Preferred Options Consultation Response
Attachments: MEECEBROOK OBJ FINAL DRAFT 08.23 6 Dec 2022.docx

Good Afternoon

Please find attached Chebsey Parish Council's response to the Preferred Options Consultation.

Could you please advise if there will be an extension to the closing date in lieu of the continuing postal strike?

Kind regards

Sue
Mrs S E Stokes
Clerk to Chebsey Parish Council



Chebsey Parish Council

Email [REDACTED]

Telephone [REDACTED]

Stafford Borough Council Local Plan 2020 Preferred Options Consultation Process. Response by Chebsey Parish Council 6th December 2022.

The councillors of Chebsey Parish Council have carefully considered the Stafford Borough Council draft local plan and wishes to express, on behalf of its residents, the strongest possible objection to the potential development of the Garden Community known as “Meecebrook”.

Chebsey Parish Council is concerned that the Meecebrook plan has been drawn up with no meaningful consultation with Chebsey Parish Council and even more alarming the parish itself receives no mention or recognition within the planning documents, despite almost 1,000 acres of parish land forming the main part of the Meecebrook development. Further the Meecebrook development poses a severe threat of coalescence and urban sprawl with many of the hamlets and villages within our parish, including the conservation area of Chebsey Village itself.

We have highlighted, below, our key points of objection:

1. Environmental and Social Impact:

Chebsey Parish comprises of a number of hamlets within a predominately highly productive and historic farming area. Meecebrook will undoubtedly have a huge detrimental impact upon the whole of the parish. In total the parish has barely 260 properties but is now facing a frightening scale of change that will include thousands of houses. We are particularly concerned that the settlements of Sturbridge, Heammies, Oxleasows and Hilcote will be totally consumed around which there are large tracts of valuable farming land, woodland area and ecologically important habitat that will disappear forever. The direct impact upon the lives and livelihoods of the inhabitants within our parish area will be destroyed, thereby wiping out hundreds of years of rural living.

We see no evidence that any assessment on the direct impact on the residents has been provided, or even taken into account within the proposal, thereby giving the distinct impression that people do not matter.

Stafford Borough Council’s own published document “**Stafford Borough Strategic Development Site Options**” dated December 2019, recognises much of the land as being of “grade 2 and grade 3 best and most versatile agricultural land with large pockets of deciduous woodland priority habitat”. We understand that close to 1,000 acres, within our parish boundaries, all of which is of a green or agricultural area, would be subject to development. We consider that such development of this land would be inconsistent with many of the previous stated objectives of Stafford Borough Council (within its own Biodiversity Policies), to safeguard the rural nature of much of the borough, whilst alternative recognised areas of a brownfield nature, along with areas already earmarked by commercial developers, are being ignored. The potential loss of the grade 2 and 3 BMV also threatens our regional and national food security policy and the permanent loss of vital high yielding farmland in our borough.

There is also a question relating to suitability of the land in terms of mineral rights that exist to parts of the site. Chebsey Parish Council is aware that a part of the site is known to have contamination by naturally occurring Radon.

2. Flooding Risk and impact of adjacent areas.

The “**Stafford Borough Strategic Development Site Options**” describes the area as being of “medium risk” of surface water flooding. We see that that the “Surface Water Management Plan” identifies **frequent flooding** within the site area. Both the Meecebrook and the River Sow are important sources of land drainage and flood management within and around the designated area, in fact land near the B5026 is determined as a “high risk” flood area, which as a Parish Council we are all too aware of due to regular flooding of land and roads abutting the proposed site. We therefore question why an area with a history of floods should be deemed suitable for development, particularly in the teeth of a climate change emergency that is likely to exacerbate the risk further? As such a full topographical survey is essential on the whole area to fully understand the severity of potential flooding risk.

It appears that the Borough Council has not recognised that a greater run off, from a large area of building and infrastructure will undoubtedly cause additional flood risk, not only within the Meecebrook Settlement itself, but also to areas, such as Eccleshall, that already suffer floods due in part to the impact of the building of new property on land that previously absorbed rainfall and stream overflow.

We would draw the attention of Stafford Borough Council to Environment Agency’s “Review of policy for development in areas of flood risk” (published in July 2021), where guidance is given in regards of development in areas subject to flooding, such as the Meecebrook site. The policy document framework “expects local planning authorities, in plan making and when determining planning applications, to ensure development is steered to the lowest areas of flood risk.” We are of the opinion that SBC is ignoring this guidance.

3. Transport Infrastructure and connectivity.

The location of the potential Meecebrook site is presently predominately rural and somewhat remote. It is 3.9 km from Stone, 14km from Stafford and 20km from Stoke, all of which are important locally for work, healthcare, educational and leisure services. Presently the area is serviced in the main by narrow, single carriageway roads, with almost non-existent access to public transport, as such there is already significant pressure on routes within the area. We are deeply concerned that if the new road infrastructure is not to be constructed by 2030, then the only access to the proposed site will be via the already heavily used B5026 or via the unclassified Swynnerton Road. Confusingly the claim, in the SBC proposal, that Meecebrook is located in close proximity to the strategic road network is patently incorrect.

The development of around 3,000 homes, in the first development phase and 6,000 or more homes over time, will inevitably place a huge burden on local traffic management. We read that Highways England indicate that Meecebrook will have traffic impacts on the M6 strategic road network, with the prospect of additional access to the M6, via a new junction, being only a preliminary concept at this stage, whilst the possibility of a new West Coast railway station is unlikely to mitigate the volume of motor traffic. The prospect of a yet to be properly economically justified, rail station on the Stafford to Crewe Line, with no easy access to Stoke, is unlikely to address the travel needs of residents who work outside the main conurbations, such as the new distribution centre at Creswell, where access by road is essential for shift workers and other flexible hour employees.

We believe that the forecasts of the potential numbers of rail users, and when such usage might occur, are totally unrealistic and therefore question the whole economic viability of the rail station project.

Whilst the Local Plan describes the development as having, schools, health centres, leisure facilities and sources of employment, there will undoubtedly be the need for Meecebrook residents to access facilities, such as our already overstretched hospitals and schools, as well sources of employment, away from the settlement, way before the essential infrastructure to be in place. We are also concerned that the lack of cycle paths and walkways in our parish is not being addressed and that new walkways do not link in with the existing footpath network.

In short Chebsey Parish Council is finding it hard to see how there will not be serious traffic flow problems that will affect not only its own parish but also the current routes through Yarnfield, Swynnerton, Seighford, Eccleshall and Great Bridgeford, that are already overused and thus it is not viable for them to support the many thousands of additional traffic movements that Meecebrook would bring.

4. Review of feasibility following the non- availability of MOD land.

Chebsey Parish Council, until very recently, were led to believe that the area for the development of Meecebrook emanated from the offer of development land by landowners, along with the availability of brownfield land occupied by the MOD, in order to facilitate the required building area. We now understand that some of the landowners were in fact approached by the Borough Council, several months ago, rather than the reverse, and that the 241 acres of land at MOD Swynnerton, was withdrawn from sale, "some time ago." We question due to the loss of the MOD land if the reduction in available development land will hinder or prevent the Meecebrook development board securing the much-needed national infrastructure funding.

The "**Stafford Borough Strategic Development Site Options document**" initially envisaged up to 11,500 homes at Meecebrook and highlighted the use of the brownfield MOD land within the assessment. The settlement option has been pared back, in the absence of MOD land, to around 6,000 properties in two phases.

Chebsey Parish Council is not aware as to if, how or when, any revision to the preferred options study was conducted despite the major change of land availability. We therefore believe that it is in the public interest that a full understanding why the reason to stay with the Meecebrook option remains the choice of the Borough Council. We also believe that the Borough Council should explain if the choice of Meecebrook was made before, or after, the MOD land being withdrawn, with precise dates given.

5. The concept of delivering Garden Communities as a largely self-sufficient answer to long term housing needs is highly questionable.

Beyond the specific issues related to Meecebrook, that we have noted above, we believe that the whole concept of delivering Garden Communities and Settlements is unlikely to be the right approach for the Borough in serving its perceived long term housing needs. Such a development may be considered as being based on a fundamental shift away from cars and as a form of unrealistic social engineering

We would draw to the attention of Stafford Borough Council to the announcement by Michael Gove the Communities Secretary that the Levelling- up and Regeneration Bill would be amended to abolish mandatory house building targets. Mr Gove said he recognises ' there is no truly objective

way of calculating how many new homes are needed in an area' but that the 'plan making process for housing has to start with a number.

The change would make the centrally determined target a 'starting point' with councils able to propose building fewer homes if they faced 'genuine constraints' or would have to build at a density that would 'significantly change the character of their area'.

In a later release, the Department of Levelling-Up, Housing and Communities said the Government will set out changes to the Bill 'to place local communities at the heart of the planning system' on Tuesday 6th December.

The Bill is expected to return to the Commons next week for day two of its report stage Mr Gove stated that 'our planning system is not working as it should. If we are to deliver the new homes this country needs, new development must have the support of local communities. that requires people to know it will be beautiful, accompanied by the right infrastructure, approved democratically, that it will enhance the environment and create proper neighbourhoods' 'These principles have always been key to our reforms, and we are going further by strengthening our commitment to build the right homes in the right places and put local people at the heart of decision making'

On the basis that "compulsory targets" are no longer relevant, we question the assumptions about the housing number requirements their proposed locations for the entire borough, particularly as it helps make up shortfalls for neighbouring Authorities/ Boroughs, where both brownfield and less fertile agricultural land appears to be available, but not properly considered. We ask why SBC is happy to sacrifice our high yielding agricultural land at the expense of appeasing the planning inspectorate. As such we believe that the Meecebrook proposals cannot be justified to deliver additional housing and employment needs within the borough.

We fear that the Meecebrook proposal will end up becoming a black hole by drawing in all future investment at the expense of existing settlements. Further we are concerned that any unintended consequences through the delay of major infrastructure development will impact greatly upon our parish and the surrounding areas. We are aware that it is all too common that consultant's reports often pay little heed to the need of local residents, with the risk of fundamental issues being ignored.

It is our view that often local knowledge is more realistic and more likely to be factually correct than outside desktop views. The Meecebrook vision is based on a promise to deliver services and community facilities that rely upon others to deliver, for instance "section L of policy 7 healthcare provision" is excluded from the list of amenities, which we believe requires guaranteed funding before any such development commences.

On 28th July 2022, Rishi Sunak said that new property development should take squarely on "brownfield, brownfield, BROWNFIELD! Why therefore is the SBC Local Plan considering a greenfield option in the form of Meecebrook?"

CPRE the countryside charity, calculated that more than 250,000 homes are currently proposed to be built on land removed from greenbelt, more than four times as many as in 2013, and said "piece by piece, local authorities are eating into protected countryside, using blunt, numerical targets that fail to deliver affordable and social housing. This is despite the pressing need to revitalise our countryside so that it can suck up carbon, boost wildlife and provide much needed space for recreation in nature. We wholeheartedly welcome Sunak's brownfield first approach to planning."

The following extracts from published reports very much question the whole premise of establishing such developments:

- **Jenny Raggett, Project Coordinator at Transport for New Homes, said:**

Far from being vibrant, green communities, Garden Villages and Garden towns are at high risk of becoming car-dependent commuter estates, research by Transport for New Homes has found. The group examined plans for 20 Garden Communities and found that they will create up to 200,000 car-dependent households, generating high levels of traffic on surrounding roads including motorways.

“Put forward by the government as an alternative to characterless estates, Garden Villages may well end up with more tarmac than garden, limited public transport, and few ‘village’ amenities to walk or cycle to.”

Further, they squander land and are extremely profitable for landowners, developers and their consultants.

- **A report by Smart Growth UK (February 2020) states:**

Despite their obvious unsustainability, cost and community opposition, the Government continues to designate new garden communities and to lavish millions of pounds on their development.

Garden communities: -

- *squander land.*
- *maximize the infrastructure needs of new development.*
- *damage ecosystem services.*
- *degrade biodiversity.*
- *have lay-outs which often fail to meet their objective of encouraging walking and cycling.*
- *mostly have limited public transport access.*
- *where they have public transport, it is seldom part of a comprehensive network.*
- *damage landscapes.*
- *are often not “communities” in any sense at all - they are merely agglomerations of the sprawl developments around a town, or a series of towns.*
- *are a slow and expensive way of building houses.*
- *usually fail to meet the required “Garden City Principles” on things like land value capture and long-term community ownership and control of assets.*

Analysis of the current garden community schemes in England clearly confirms that they are:

- *overwhelmingly greenfield.*
- *they are a mix of stand-alone, urban extensions or just agglomerations of all the sprawl in the area.*
- *few have rail adequate access, and none is closely linked to a dense city rail network.*

6. Conclusion.

In conclusion we would draw the attention of the Borough Council to the “Assessment Criteria Headings” within the **“Stafford Borough Strategic Development Site Options documents,”** namely:

- Environmental constraints.
- Physical constraints, including transport and access.
- Accessibility to social and green infrastructure.
- Landscape and visual constraints.
- Heritage constraints.
- Planning policy constraints.
- Viability and economy.

Chebsey Parish Council when considering the stated elements of SBC's "Assessment Criteria" is convinced that Meecebrook is a patently unsuitable development to meet the needs of Stafford Borough Council's future housing needs.

We believe that by choosing Meecebrook over other potential sites, which have more suitable and less invasive transport infrastructure services, then SBC will miss a "golden opportunity" to remediate present brownfield sites. Such a large development not only risks putting the Borough's housing needs as all "eggs in one basket," but we believe that the idea is fundamentally flawed in so many ways, and that it requires a complete rethink.

We therefore affirm our strong objection to the Meecebrook option.

The Councillors of Chebsey Parish Council.

From: [REDACTED]
Sent: 12 December 2022 10:31
To: Strategic Planning
Cc: [REDACTED]
Subject: Stafford Borough Council Local Plan
Attachments: Local Plan Agricultural Properties.docx

Good Morning

Please find attached a document from Chebsey Parish Council regarding policies around agricultural properties.

Kind regards

Sue
Mrs S E Stokes
Clerk to Chebsey Parish Council



Chebsey Parish Council

[REDACTED]

Email [REDACTED] Telephone [REDACTED]

Local Plan - Agricultural/Forestry and associated Enterprises Workers Dwellings

As a rural Parish Council, Chebsey PC would request that the policy on the above be more stringent so that it is not abused. We have a case where an agricultural tie has been lifted and a subsequent new application has been received for the same business but with a different owner. Whilst we don't want to inhibit any genuine cases, we believe that tighter restrictions are required on stock housing stock being sold on which ordinarily wouldn't have been granted planning permission if it wasn't for a Section 106 under Agricultural workers etc.

We would also like to see added ' new buildings will only be permitted where it can be demonstrated that the conversion or re-use of a suitable building cannot accommodate the proposed activity, see Yorkshire Dales National Park, Local Plan 2015-2030

We believe that there needs to be guidance on what is an acceptable size and any Section 106 should have a clause that if a property does have an agricultural tie/Section 106 removed then 50% of the uplift in market value should be payable to SBC for the social housing needs of the Borough. We believe that such a policy is in place by our neighbouring county, Shropshire County Council.

One must remember almost all of this type of planning applications would not normally be allowed in the countryside; hence we need to protect our landscapes and make sure any future housing stock meets the needs of the community.

Chebsey Parish Councillors



Reference ID Code: 9; Church Eaton Parish Council

12 DEC 2022

Church Eaton Parish Council



6th December 2022



Stafford Borough Council
Civic Centre,
Riverside,
Stafford
ST16 3AQ

Dear 

RE: Stafford Borough Local Plan 2020-2040: Preferred Options Consultation

The preferred options consultation document was discussed at the Church Eaton Parish Council meeting on 6th December 2022. The Parish Council recognises that Church Eaton Parish is categorised as Tier 5 of the Settlement Hierarchy and is therefore not an area designated for new development. The Parish Council voted unanimously to support this categorisation of Church Eaton Parish, as our response to your Consultation.

Yours sincerely,



Simon Moore.
Chairman,
Church Eaton Parish Council.

From: Ian Culley [REDACTED]
Sent: 08 December 2022 09:06
To: Strategic Planning
Subject: Preferred Options consultation response
Attachments: SLP PO Response 071222.docx

Sensitivity: NOT PROTECTIVELY MARKED

Good morning,

Please see attached an interim officer response from the City of Wolverhampton Council to the Preferred Options consultation.

The Council's Cabinet are meeting on the 14th December to consider this submission and I hope to be able to confirm it shortly afterwards.

In the meantime I would be grateful if you could confirm receipt of this response.

Kind regards

Ian

Ian Culley
Lead Planning Manager (Regional Strategy)
Tel. [REDACTED]

[E-mail:](#) [REDACTED]
City of Wolverhampton Council



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CITY OF
WOLVERHAMPTON
COUNCIL

7th December 2022

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

Dear Strategic Planning Team,

Stafford Borough Council New Local Plan 2020-2040 – Issues and Options consultation

This letter contains the officer response on behalf of the City of Wolverhampton Council to the Preferred Options Consultation. The Council's Cabinet will be considering this response at their meeting on 14th December and I hope to be able to confirm this officer response following that meeting.

In summary, the Council welcomes the progress made with the new Local Plan, and the positive approach which it takes to the Duty to Cooperate in responding to the unmet housing and employment land needs of neighbouring Local Plan areas. In the context of this broad support, we have a number of points which we wish to raise on specific issues. Our detailed response is set out below.

Background

A representation was submitted to the previous stage (Issues and Options) of the Plan preparation process in 2020 on behalf of the City Council through the Association of Black Country Authorities (ABCA). This representation requested that the Local Plan should promote growth options in excess of local needs in order to provide housing and employment land which could meet needs arising in the Black Country, given the shortfall across the area as a whole as identified through work on the Black Country Plan (BCP). The representation specifically highlighted the role of a proposed new settlement at Meecebrook as being well-placed to meet these needs subject to significant infrastructure investment in order to enhance its accessibility. The ABCA 'request' was for the provision of some 1,500-2,000 homes and 35-40ha of employment land to meet needs arising in the Black Country.

As you may be aware, in September 2022 the Leader of Dudley Council announced that he wished to withdraw the Council from involvement in the BCP. The four Black Country Councils subsequently agreed to prepare individual local plans and the associated Local Development Schemes (LDSs) are in the process of being brought into effect.

The Wolverhampton Local Plan

The Wolverhampton LDS was adopted by Cabinet on 26th October

(<https://wolverhampton.moderngov.co.uk/documents/s223167/Appendix%201%20->

 wolverhampton.gov.uk

@WolvesCouncil

WolverhamptonToday

City of Wolverhampton Council

[%20Wolverhampton%20Local%20Development%20Scheme%20Oct%202022.pdf](#) , confirming the commitment of the Council to continue to prepare an up to date Local Plan in a robust and timely manner. There is an Issues and Preferred Options consultation on the Wolverhampton Local Plan programmed for February 2023, followed by a Regulation 19 consultation in summer 2023.

The Local Plan will build on the work progressed on the BCP and subsequent evidence. Our current position on housing and employment land need and supply is as set out in the Draft BCP, published for consultation in 2021. In the case of housing, the Draft BCP identified a shortfall of some 28,000 homes to 2039 across the four Council areas. For Wolverhampton, the housing shortfall is substantial at some 7,900 homes.

Turning to employment land, the Planning Practice Guidance encourages strategic Plan-making authorities to identify needs on a Functional Economic Area (FEMA) basis. In the case of Wolverhampton, the City is located within the Black Country FEMA as identified in the Black Country Economic Development Needs Assessment (EDNA) published in 2017. Across the FEMA as a whole, the BCP identifies a shortfall of some 210ha of employment land to 2039, this being the sum of shortfalls across the four Council areas. The EDNA confirms that the Wolverhampton element of this shortfall is between 40ha to 80ha.

While the Council will be updating land supply as part of the preparation of the Local Plan, we do not anticipate that the work will reveal any significant sources of additional land to meet housing or employment needs. The Wolverhampton Local Plan will have a Plan period extending to 2040, adding a further one year of housing and employment land demand which may have the effect of increasing the shortfalls outlined above.

For these reasons, we are strongly of the view that the Wolverhampton housing shortfall identified in the Draft BCP remains and could potentially rise further. The ABCA representation to the Issues and Options consultation identified a strong functional relationship between the Black Country and Stafford Borough, and highlighted the relationship with Wolverhampton in particular as being a strong one. On this basis, the Council consider that not only is there compelling evidence of a housing shortfall arising in Wolverhampton, but also that Stafford Borough is well placed to make a contribution towards addressing this shortfall through the current Local Plan.

The Preferred Options consultation

The Preferred Options document sets out to deliver 10,700 (535 per year) new homes between 2020 and 2040. This consists of 435 dwellings each year to meet Stafford Borough's identified housing need with 100 homes per year to meet unmet housing needs from other authorities. However, it is proposed that the Plan should provide sufficient land supply to deliver a total of 12,580 homes. This surplus of 1,880 homes, which amounts to 15% of the housing requirement, is intended to provide a 'buffer', to allow for the potential non-implementation of some of the sites identified in the Plan. However, the evidential basis for this buffer is not clear and any of the buffer not required to allow for non-implementation could be added to the offer made to other authorities. It is understood that the majority of the Stafford Borough Local Plan housing supply will be on greenfield land with few constraints, and that some brownfield sites have not been counted in supply because of concerns regarding their deliverability. In comparison, the Draft BCP provided an evidenced buffer of only 5% for a primarily brownfield housing land supply, including some sites with constraints. Therefore, a buffer of 5% is suggested to be more

appropriate, subject to evidence which should be prepared to support the Regulation 19 Plan.

Notwithstanding our observations on the 'buffer' issue, the Preferred Options consultation document has responded positively to the ABCA representation by including the provision of 2,000 homes over and above local needs through the housing target set out in Policy 1, and through the reference in para 1.4 to meeting needs arising in 'other authorities' in the region.

This figure is based on the development of the Meecebrook garden community which is allocated in the Local Plan. The 'other authorities' are not defined but as discussed above, Wolverhampton has a functional relationship with Stafford Borough in terms of migration patterns and travel to work data and should be recognised as one of those 'other authorities'.

The principle of the 2,000 contribution to meeting wider needs is therefore welcomed. However, in order to provide certainty for the progression of the Wolverhampton Local Plan and to inform our ongoing Duty to Cooperate engagement with other neighbouring Local Plans, it is critical that a Wolverhampton element of the 2,000 homes contribution is confirmed as soon as possible.

Migration patterns form a sound evidential basis to approach this issue but in calculating an appropriate and reasonable apportionment, it is also important to have regard to shortfalls arising in other areas which have a relationship with Stafford Borough, notably the Black Country Councils and Birmingham, which has also published evidence of a housing shortfall of some 78,000 homes through the initial stages of the Birmingham Local Plan review. Analysis of migration patterns between the Black Country / Birmingham and Stafford Borough over an extended time period (2002-19) shows that Wolverhampton movements account for some 27% of flows, Walsall having the largest share at some 33%, Birmingham 18%, Sandwell 12% and Dudley 1%.

However, whereas Wolverhampton and Sandwell have housing need figures which far outstrip the housing capacity identified in the Draft BCP, it is not currently clear if either the Dudley Local Plan or the Walsall Local Plan will generate a residual housing shortfall. The Draft BCP evidence shows that there is sufficient urban land in Dudley to meet Dudley local housing needs. This means that there is currently no evidenced shortfall in Dudley, and also that green belt sites, such as those consulted on in the Draft BCP, could provide additional housing to meet the needs of other authorities with a clear shortfall, such as Wolverhampton. The Walsall Local Plan preparation process is not due to commence until later in 2023 and any future shortfall has the potential to be met through contributions from the Shropshire and Lichfield Local Plans, which are at an advanced stage and have agreed contributions towards the Black Country as a whole. On this basis, it would be appropriate for the Stafford Borough Local Plan contribution to be divided between Wolverhampton, Sandwell and Birmingham in proportion to their share of net migration inflows, with Wolverhampton allocated at least 47%, or 940 homes if applied to 2,000 homes.

The 2,000 contribution is based on the delivery of 3,000 homes at the Meecebrook site as part of a phased programme which will extend beyond the current Plan period. If development is in excess of this figure, (or through the review of the 'buffer' allowance a

high housing land supply is identified) then potentially the 2,000 offer and the Wolverhampton share of it could be increased.

The Council is supportive of the Meecebrook allocation (Policy 1) as the principal basis for the contribution to meeting wider needs. The Council echoes the previous ABCA response which recognised the benefits of this strategic opportunity through its ability to create a new sustainable settlement providing a rich mix of new homes, employment opportunities and services. We note that in order to fully realise its potential, significant infrastructure enhancements will be required and the Council is supportive of all efforts to secure the funding which will be necessary to deliver this project.

Turning to employment land, the Local Plan does not include an equivalent 'offer' but does contain significant 'headroom' of employment land supply (150ha) against the demand target of 80ha. This supply includes some 15ha at the Meecebrook site which is of a scale designed to address the employment needs of new residents in order to secure a degree of self-containment. Given that Meecebrook is identified as meeting needs arising in neighbouring areas, then as a minimum, it is requested that a significant proportion of the employment land element of the development should be considered to be capable of meeting needs arising in Wolverhampton and the Black Country FEMA given the functional relationship outlined above.

In the context of the levels and location of growth set out in the Local Plan, CWC is committed to work together with Stafford Borough Council, other authorities across the region and Natural England, on the potential combined impact of Local Plan developments on Special Areas of Conservation (SAC), including: through the Cannock Chase SAC Partnership regarding visitor impacts on Cannock Chase SAC; and through on-going work to address potential air quality impacts on SACs across the region. The Council is therefore supportive of proposed Policy 48: Cannock Chase Special Area of Conservation (SAC) which provides protection to the SAC through the requirements of any development within a 15km radius of the SAC providing appropriate avoidance and/or mitigation of any adverse effects.

We trust that these comments are helpful and will be considered by the Council as part of the preparation of the next stage of the Local Plan.

Yours sincerely,

Ian Culley

Lead Planning Manager (Regional Strategy)

Tel: [REDACTED]

Email: [REDACTED]

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

Full name: **Cllr Andrew Cooper**

Email: [REDACTED]

Statutory Bodies and Stakeholders

Organisation or Company: **Stafford Borough Council**

Age: [REDACTED]

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 reply**

Comments: **No reply**

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

Comments: **I'm concerned with Milford being identified as tier 5 and policy 2 allowing development within the tier 5 settlements - especially with Milford's proximity to Cannock Chase SAC. The proposed boundary line for Milford encompasses a previously proposed development adjacent the railway line and Holdiford Road (20/33615/OUT). This proposed development should be excluded and the boundary shown tight to the existing cottages and other residential boundaries.**

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? **Yes**

Comments: **No reply**

Connections

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

Comments: **Policy 53 supported by Appendix 4 specifically C3 - Parking for residences. More spaces are required based on (say) a 3 bedroom house with 2 adults and potentially two driving age other young adults - requires 4 spaces. Failure to do this forces more traffic on the roads with resulting neighbour disputes. My assessment doesn't even reflect potential visitors. This is a typical situation in my experience.**

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

From: Brendan McKeown
Sent: 11 December 2022 17:55
To: SPP Consultations
Cc: [REDACTED]
Subject: FW: local plan response Cllr Brendan McKeown
Attachments: 20221211 Cllr Brendan McKeown personal response.pdf

Good evening

Please see attached my personal response as Stafford Borough Council Ward Member for Haywoods & Hixon

Kind regards

Cllr Brendan McKeown



Brendan McKeown | Councillor for Haywood and Hixon Ward

Stafford Borough Council | [REDACTED]

[REDACTED] | www.staffordbc.gov.uk

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From: [REDACTED]
Sent: 11 December 2022 17:36
To: [REDACTED]
Subject: local plan response

COUNCILLOR BRENDAN McKEOWN
STAFFORD BOROUGH COUNCIL
HAYWOODS & HIXON WARD

RESPONSE TO STAFFORD BOROUGH COUNCIL CONSULTATION
LOCAL PLAN REVIEW PREFERRED OPTIONS OCTOBER TO DECEMBER 2022

I write this as an Independent member of Stafford Borough Council representing the Haywoods & Hixon Ward and I welcome the opportunity to comment on the latest stages of Stafford Borough Council's Local Plan Review consultation process.

I have considered the proposed Settlement hierarchy as set out on page 34 of the preferred options booklet. I note that Hixon, Great Haywood, Little Haywood and Colwich are defined as 'larger' settlements and are placed in Tier 4 of the Settlement hierarchy table..

However, the future success, or otherwise, of the Local Plan Review Preferred Options at December 2022 in terms of housing allocations sites, is largely dependent on the delivery of the Meecebrook Community Garden Village, where 3,000 housing units are proposed. There is an absence of any alternative 'Plan B' which is a matter of concern should the Meecebrook development fall short of its projected targets. A detailed time-line and schedule of development would be welcome if the Local Plan Preferred Options proposals are adopted.

Unlike previous Local Plan reviews, there appears to be no significant proposed housing development sites within the Ward I represent.

On closer inspection, I have concerns about a slight re-drawing of the Hixon residential boundary which differs from the existing Hixon residential boundary:

- 1) Land at Puddle Hill, Hixon, adjacent to existing domestic property 'Wassand'. The latest proposed Preferred Options insert map for Hixon shows the red line extended to the west beyond the existing residential development boundary into open countryside. This site is the subject of an undetermined planning application (Ref: 21/34598/FUL) which I have called in for Planning Committee decision. The reason for the Call-In is given as "land is outside Hixon Residential Boundary as defined in Hixon Neighbourhood Plan and the Adopted Plan for Stafford Borough." It is my view that to include this site in the proposed residential boundary prejudices the outcome of that planning application. **The site should be removed from the proposal in the Local Plan Review 2022.**

- 2) Land at Egg Lane, Hixon, adjacent to Yew Tree House. The proposed residential development appears to delete a site for eleven houses which was permitted in January 2020 under planning application Ref 18/29383/OUT. The site is currently undeveloped and untidy. **My view is that the site should remain within the residential boundary and be re-instated in the Local Plan Review Preferred Options.**

- 3) Land adjacent to 19, Swansmoor Drive, Hixon ST18 0FP. The Hixon residential boundary insert map shows a finger of land extending south-east outside the current residential development boundary. Hixon Parish Council raised the issue of the apparent unauthorised extension of the domestic curtilage of the property several years ago. An Enforcement Officer visited the site and concluded the enclosure of land outside the residential boundary was being used as a 'smallholding' for the housing of poultry etc. and found no reason to take further action. **I object to this finger of land being incorporated into the Preferred Options 2022 proposed residential development boundary as it would create an undesirable precedent for future such unapproved development.**

Apart from the three points above, the residential development proposals and hierarchy set out in the Preferred Options statement in the latest Local Plan Review are welcome.

I also welcome confirmation in the Preferred Options consultation that the existing Recognised Industrial Estate Boundaries in Hixon are not proposed to be extended.

Comment: Over the years the Haywoods and Hixon have accommodated relatively significant numbers of new house building sites (in particular Great Haywood) without there being any commensurate improvement in local amenities, facilities or public transport. Any future development proposals in Haywoods and Hixon should address these issues.

Moving away from the housing and industrial development proposals in the Local Plan Review, I note that a large area of open countryside to the south west of Weston is annotated as "Potential Renewable Energy" site. The area is on a highly exposed site sloping down to the river Trent. Further details would be welcome.

Notwithstanding these fairly parochial observations about the Haywoods and Hixon Ward and the immediate surrounding area, there are other issues within the consultation documents on which I wish to comment:

Policy 4: Climate Change Development Requirements;

Comment: I welcome proposals that ensure new housing properties are built to the highest insulation standards and moving away from on-site fossil fuel consumption. In addition, to a requirement for all newbuilds to have the highest insulation standards there should be a requirement for newbuilds to be fitted with solar panels as standard where appropriate.

Policy 4 is supported.

Policy 5: Green Belt;

Comment: I welcome the confirmation that the adjacent North Staffordshire Green Belt and West Midlands Green Belt will not be altered in the Local Plan Review. Furthermore, in order to preserve green belt areas, greater emphasis and pressure should be placed on utilising brown field sites. These are not popular with developers but there are many disused sites and buildings both within the urban town areas and outside which could be utilised for housing.

Policy 5 is supported.

Policy 6: Neighbourhood Plans;

Comment: Both The Haywoods and Hixon have deposited Neighbourhood Plans which were subsequently adopted by Stafford Borough Council. I am concerned that previously adopted and emerging Neighbourhood Plans may have diminished powers to influence local developments in the future. Further information required.

Policy 18: Home working and small scale employment uses;

Comment: I welcome small scale offices of less than 100m², subject to location within the development boundary and design.

Policy 19: Town Centres;

Comment: I am hugely in favour of regenerating town centre high streets, More details need to be forthcoming about how the £14.4m Government grant and matched funding will be utilised. In particular the area between Market Square and Gaol Square in Stafford.

Policy 20; Agriculture and Forestry;

Comment: I welcome proposals that encourage local food growing to reduce food miles, subject to appraisal of the implications on local infrastructure.

Policy 21: Tourism;

Comment: I welcome more encouragement for people to visit the areas subject to adequate provision of parking facilities and/or improved public transport services.

Policy 22: Canals;

Comment: I support the protection of canals and towpaths, surrounding conservation areas and green corridors.

Policy 23: Affordable Housing;

Comment: I support the proposals for the percentage of affordable housing as set out. However, a commitment to affordable housing alone needs to be expanded to the type and size of houses. Large luxury homes are popular with developers as they bring in the money. However, the housing shortage is amongst first time buyers and housing developments should contain a much higher proportion of smaller properties that are inevitably much more affordable but would not strictly fall within the tight

definition of 'affordable housing'. I would welcome further details how the proposals impact on S106 developer contribution agreements.

Policy 41: Historic Environment;

Comment: I support proposals that preserve and where appropriate enhance the significance of heritage assets.

Policy 43: Sustainable Drainage;

Comment: I support proposals to incorporate Sustainable Drainage Systems (SuDS) subject to location and capacity reassurance.

Policy 45: Cannock Chase Area of Outstanding Natural Beauty (AONB);

Comment: I support the conserving and enhancing the landscape of the Cannock Chase AONB.

Policy 49: Trees;

Comment: I support proposals that encourage the planting of new trees and the protection of existing trees. I would like to see policies that requires developers to design 'tree-lined' streets as an integral part of the new housing development applications.

Policy 52: Transport;

Comment: I support proposals that minimise the use of private cars by placing developments near existing amenities and facilities and public transport. Alternatively, incorporate new amenities and facilities into the developments and/or extend public transport provision.

Policy 53: Parking and Electric Vehicle Charging Points Standards.

Comment: I support Policy 53 proposals.

Cllr Brendan McKeown
Stafford Borough Council
Haywoods & Hixon Ward

From: Jeremy Pert
Sent: 11 December 2022 20:24
To: Strategic Planning Consultations
Cc: [REDACTED]
Subject: Local Plan Consultation Response
Attachments: Preferred Options Consultation - Cllr Jeremy Pert - Dec 22.pdf

Good evening,

Please find attached my response, as the Local Ward Member for the Eccleshall ward on Stafford Borough Council, to the Local Plan Preferred Options consultation.

If you would like any clarification to the various points being made, please don't hesitate to contact me direct, otherwise I hope you will take them into account as part of the Regulation 19 preparation for the Plan for the period 2020 - 2040.

Thanks

Regards

Jeremy
COUNCILLOR JEREMY PERT
STAFFORD BOROUGH COUNCIL - Ward Member for Eccleshall

[REDACTED]
www.jeremypert.co.uk

Mobile : [REDACTED]

I have an ad hoc bi-annual Newsletter covering some of the work that is going on in the local area, unless you tell me differently, I assume that you will be happy to receive this Newsletter electronically. If at any stage you want to opt out of receiving this Newsletter please can you drop me an email to [REDACTED] and I will remove you immediately from receiving the local newsletter. Thanks.

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Jeremy Pert | Councillor for Eccleshall Ward
Stafford Borough Council | Bank Farm | Croxton | Stafford | ST21 6PE
[REDACTED] | www.staffordbc.gov.uk

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Contact Details

Full name (required) : **Borough Councillor Jeremy Pert,**
Eccleshall ward, Stafford Borough Council

Email (required) : 


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

Residents and General Public

Organisation or Company Name (if applicable):

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 / No

Policy 1 Comments:

Given the government looks to be moving away from mandatory Housing Targets on Local Authorities as part of the Levelling-up and Regeneration Bill, subject to final amendment of the Act before Christmas, it would make sense for the new Local Plan to reflect the current position of government and instead directly meet all of the growth needs of the Borough (435 homes pa over the plan period rather than 535 homes pa) through this Plan, as it could have detrimental, unforeseen impacts on the Borough.

This would reduce the amount of new homes needed to be built, which should be reflected in the new Local Plan submission for examination.

The Levelling-Up and Regeneration Bill also places an emphasis on 'brownfield first' as an approach for sequential testing of available land for development. This approach would seem to accord with the Plan's green credentials.

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

Yes / ~~No~~

Policy 2 Comments:

For all our settlements to remain places where people want to live, invest and build their lives and thrive, there needs to be a certain level of housing growth to accommodate those families that want to stay long term within their settled communities.

Equally, services have been lost over the past few decades because there are insufficient 'service users' to be able to make them viable.

This planned development hierarchy moves away from starving some of our communities of the development they need, whilst protecting green fields from undue development.

Policy 3. Development in the open countryside - general principles

Yes / ~~No~~

Policy 3 Comments:

The War in Ukraine, amongst other recent events has demonstrated amongst other things the importance of the UK regaining some security of its own food production and land use.

Ensuring development happens in the most appropriate places first and foremost is important. This includes re-using redundant land – like golf courses and aerodromes, where the original historic uses have fallen into obscurity.

Developing in the 'Open Countryside' will only create further development in the similar areas, with infrastructure unplanned and a narrow lane of ribbon development across many areas. This goes against the core principals of a strategic development document / plan / hierarchy.

Policy 4. Climate change development requirements

Yes / ~~No~~

Policy 4 Comments:

Given week by week we can see the increased impacts of Climate Change around the World, anything that anyone does to increase these impacts just makes the job to mitigate its impacts more difficult for everyone else.

Given building (housing and commercial development) represents 25% of our emissions, and there is already a significant challenge ahead to retrofit significant numbers of housing across the UK, there is no sense in not taking a clear standpoint and ask developers to deliver green homes, such that every property delivered should be carbon neutral.

This policy is to be welcomed for its stance on delivering more widely on climate change credentials and aspirations for the Borough.

Policy 5. Green Belt

Yes /~~No~~

Policy 5 Comments

Policy 6. Neighbourhood plans

Yes /~~No~~

Policy 6 Comments:

Although I would encourage Neighbourhood Plans to be very specific about ‘build out rates’ for any housing proposed, such that it can be phased over the life of the plan period rather than all at the front end – and for any housing estates of size to reflect the vernacular of the existing settlement, so that any development is welcomed and phased in its impact on the existing settlement.

I would also encourage Neighbourhood Plans to be more than just about where and how much development can take place during the Plan period, but to include things like infrastructure requirements, amenity aspirations and locally applicable design standards.

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?

Yes/ No

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:

Given the level of development in Stafford over recent decades and more recently in Stone and in the past decade in the Key Service Villages, there is a significant risk of over-development.

The opportunity to develop in Stafford without significant local infrastructure is limited, with most of the appropriate sites identified as part of the Local Plan Preferred Options.

Many of the Key Service Villages have taken significant development in the past seven to ten years and were that to continue unabated for the new Local Plan period would risk those historic settlements losing all resemblance to their historic character and past.

This for example is a very real risk for Eccleshall – where 323 new homes have been built between 1st April 2011 and 31st March 2019, and many more subsequently to that. That represents a growth of 23.8%, with today's figure being closer to a third growth.

Therefore a development strategy that avoids putting significant new development in Eccleshall, Yarnfield, Adbaston, Cold Meece, Cotes Heath, Creswell, Croxton, Great Bridgeford, Norton Bridge, Swynnerton and Tittensor in particular has to be welcomed.

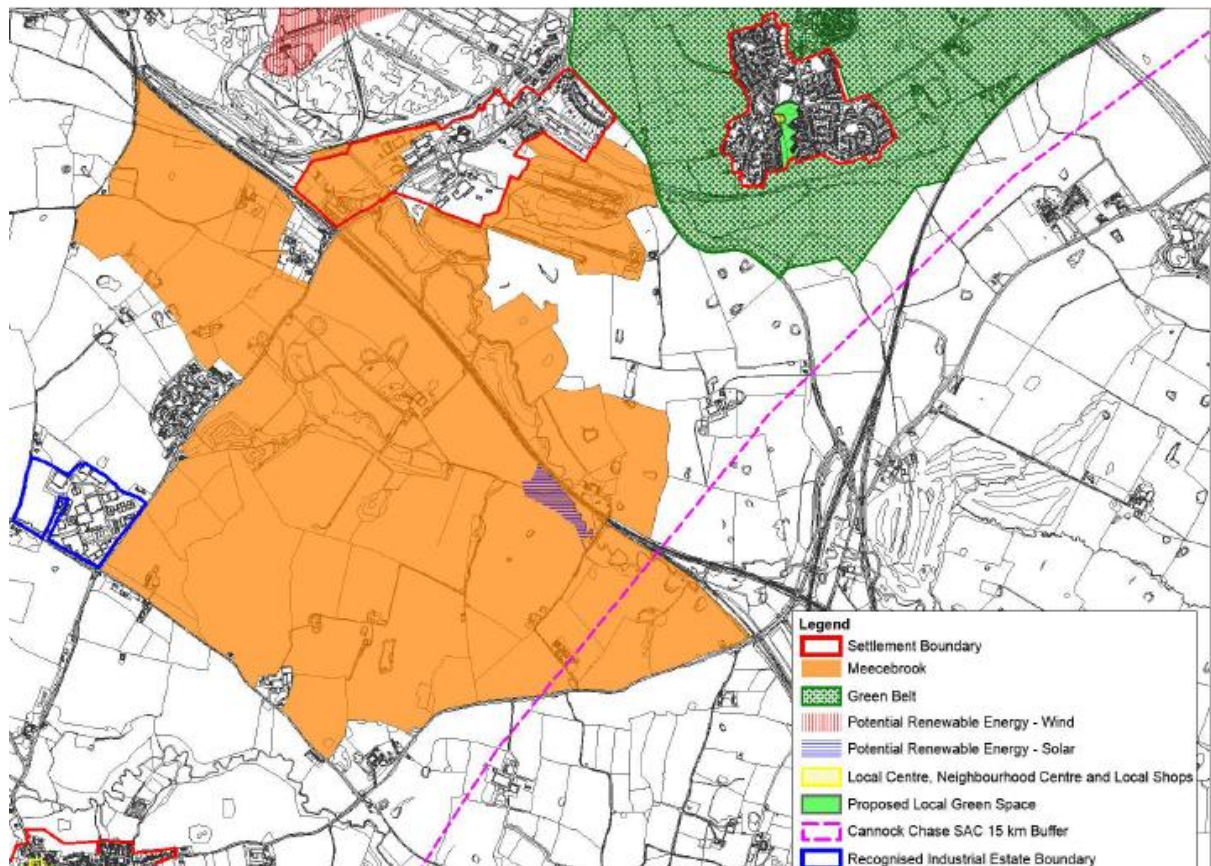
This strategy obviously relies on a new Garden Settlement to deliver the required housing numbers.

However, I am concerned by the proposals as they stand for the following reasons, and they would benefit from taking them into account :-

1. Proximity and Distinctiveness to nearby settlements

The proposed new garden settlement boundaries would represent a significant development of up to 6,000 homes being built over a twenty year period (from 2030 – 2050), which would infill much of the land between the Swynnerton Road and Stone Road, immediately north east of Eccleshall and south east of Yarnfield.

Where the boundaries are proposed currently would risk undermining the distinctiveness of the historic settlements of Eccleshall and Yarnfield and over time – i.e. in forty or fifty years time - risk the new garden settlement merging those two other settlements into the larger garden settlement.



There is just 500 and 700m from the edge of the settlement to the nearest homes close to Eccleshall in the area and 800m to the edge of Eccleshall itself. This is comparatively touching distance.

For the garden settlement to work, it needs to be distinctive and not 'swallow up' neighbouring communities.

There is the need to create a distinctive community that is harmonious within the existing area and by having the boundaries too close to existing settlements will only make that task of creating something positively viewed and appreciated just that little bit more difficult.

The edge of the garden settlement is just over 1,200m away from the north side of Eccleshall and given the settlement's modernity, could conflict with the historic nature of Eccleshall, given the views from the Castle and Church amongst other historic landmark buildings, and the striking nature of the Conservation Area and many other historic and listed buildings. It would also undermine all the work undertaken over many centuries to maintain the individual nature of historic settlements.

The impact on Cold Meece will be profound given it is within touching distance of – actually adjacent to – the settlement and more thought needs to be given to how that settlement will look and feel in thirty years time – for example will it become a distinct area within the garden settlement or a long-forgotten adjunct to the settlement, like a 'poor relation'. The vision for this existing area needs to be enunciated and explained to local residents living there, as well as within the development plan.

Yarnfield is approximately 350m from the boundary of the proposed new settlement. All the points made about Eccleshall equally apply to Yarnfield, although I note that the proposals for the far eastern side of the Garden Community involve the re-use of brownfield land.

The original concept of the garden settlement was to re-use brownfield land that is in public ownership and remediate it, what these proposals represent is a long way from delivering against that specific and laudable concept.

By using approximate distances within the consultation document from 'the centre of the site', this fails to identify what impact the garden settlement will have on the existing neighbouring settlements and this should be more clearly thought through.

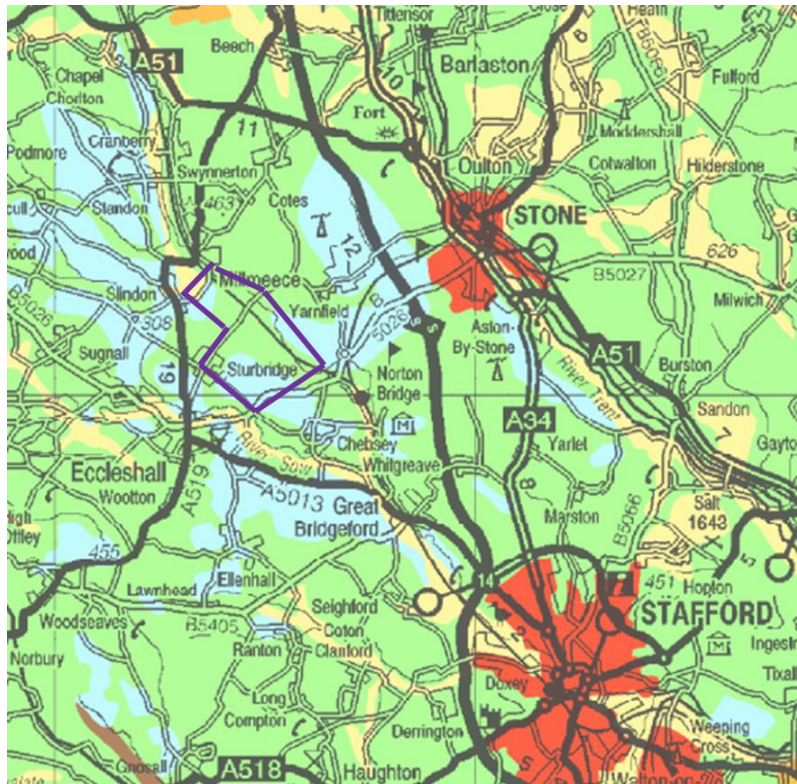
Given this, the settlement boundaries should be re-drawn and revised accordingly to mitigate the bulk of the impacts on the local community, which have a vital role to play – firstly in providing services to the new community dwellers, secondly in accommodating some of the resultant impacts and thirdly in supporting the homogeneous community.

One of the commitments should also be a strong line of densely planted trees, planted at the outset of the development and in as old a form as possible – i.e. growing five or six year old trees rather than whips – to create a boundary that can develop quickly to delineate the edge of the settlement for future generations.

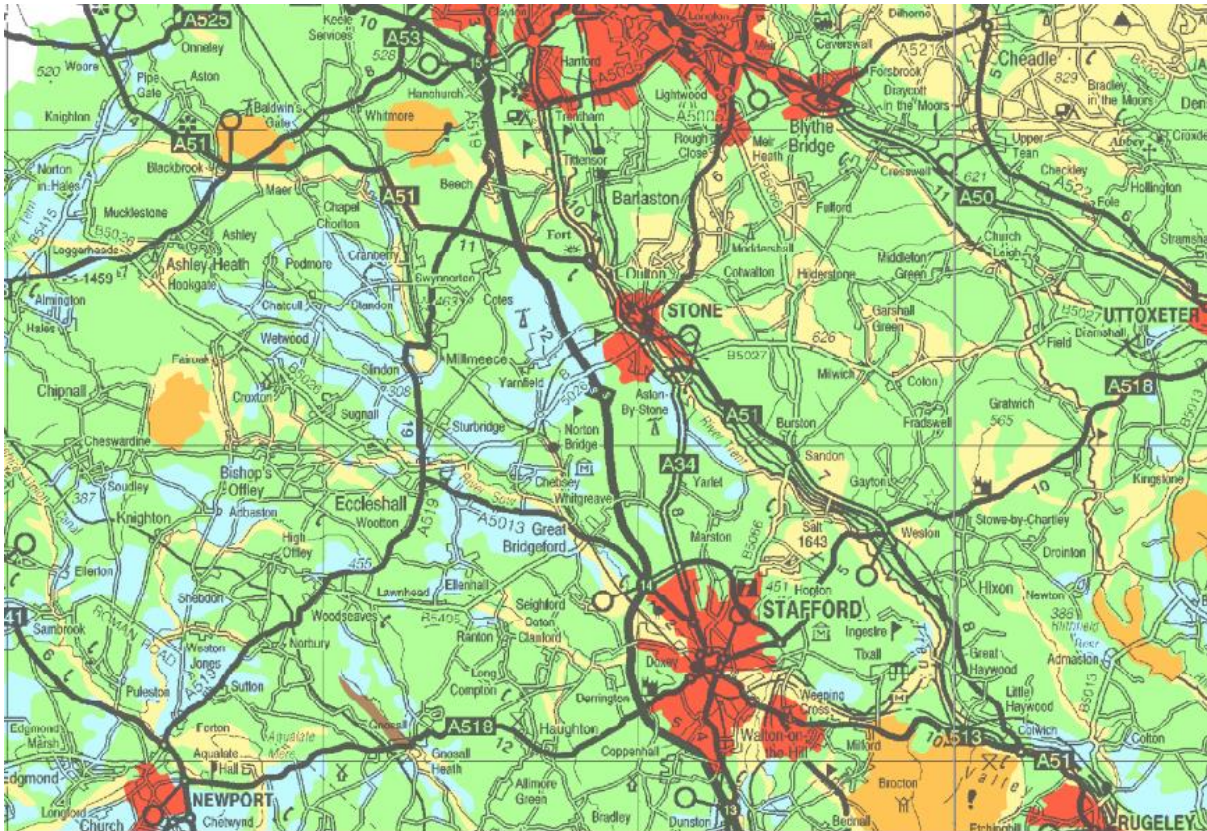
The existing greenbelt butting up to the settlement should be extended to encompass all of the surrounding boundaries, so that future development outside of the proposed boundaries can be ruled out long term.

2. Quality & Grade of Agricultural Land

Natural England rate the land proposed as Grade 2 (very good) and Grade 3 (Good to Moderate), given the shortage of Very Good (Grade 2) agricultural land in the Borough it is a pity that this is being turned over to building land, rather than being protected and instead Poor land (Grade 4) being used.



- 1 Excellent
 - 2 Very Good
 - 3 Good to Moderate
 - 4 Poor
 - 5 Very Poor
- Non-Agricultural Land**
- Other land primarily in non-agricultural use
 - Land predominantly in urban use



[Agricultural Land Classification map West Midlands Region - ALC004 \(naturalengland.org.uk\)](http://naturalengland.org.uk)

All Very Good (Grade 2) land should be removed from the proposals and left in agriculture to help ensure the country develops some food security long term.

3. **Flood Risk Factoring in 100 Year Time Horizon**

Due to climate change, flooding events will become more regular and severe, and with the planned lives of buildings being @ 100 years, it should be expected that new homes will need to be better planned to ensure that they can last their economic lives without being flooded regularly.

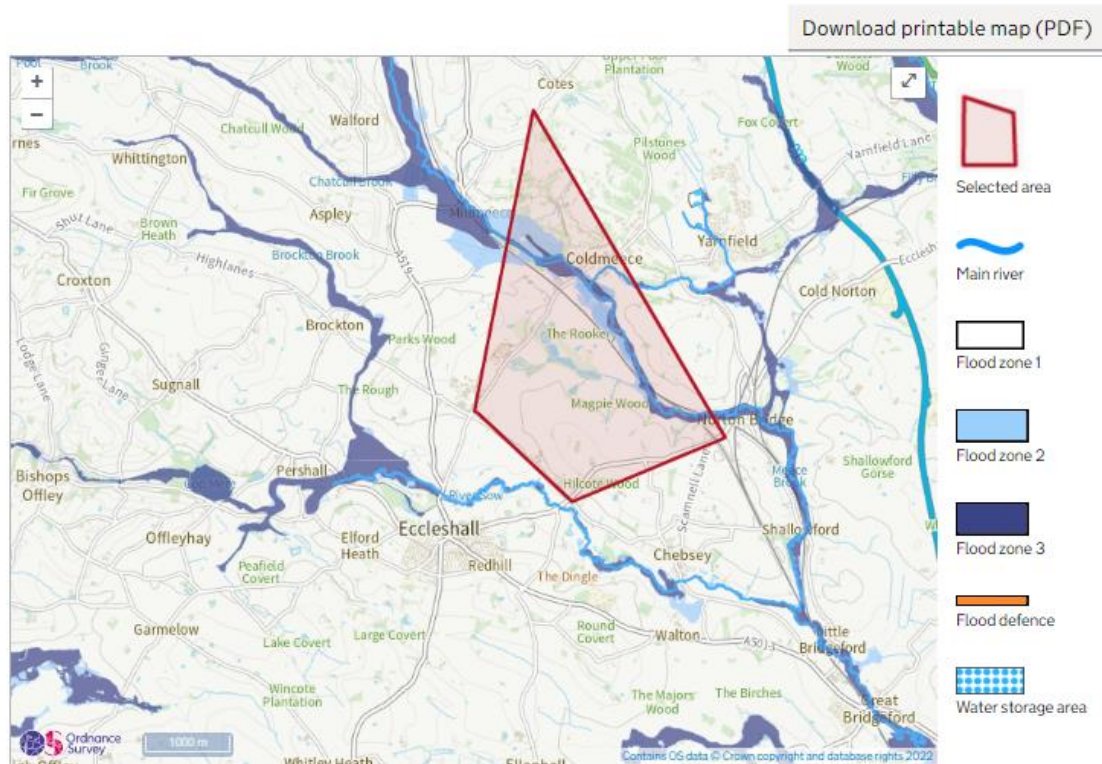


[Learn more about this area's flood risk - GOV.UK \(check-long-term-flood-risk.service.gov.uk\)](https://check-long-term-flood-risk.service.gov.uk)

It should be noted that some of the site is in Flood Zone 3, which carries a high risk of flooding and the Town & Country Planning Association would advise against using this land for building. Over time this existing area could become more extensive as sea levels rise and this direction of travel should be factored into the areas excluded for development.

Your selected location is in flood zone 3. This means it has a high probability of flooding.

[More information about your results](#)

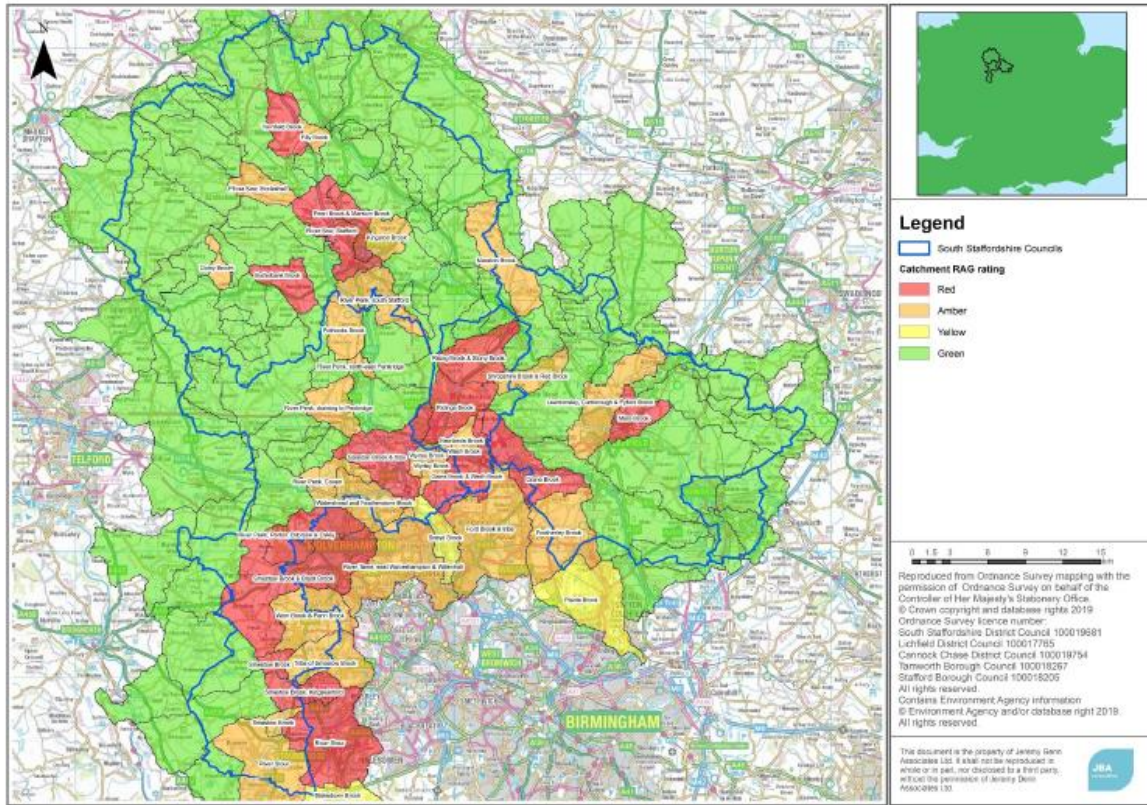


[Flood risk information for this location - Flood map for planning - GOV.UK \(flood-map-for-planning.service.gov.uk\)](https://www.gov.uk/flood-map-for-planning.service.gov.uk)

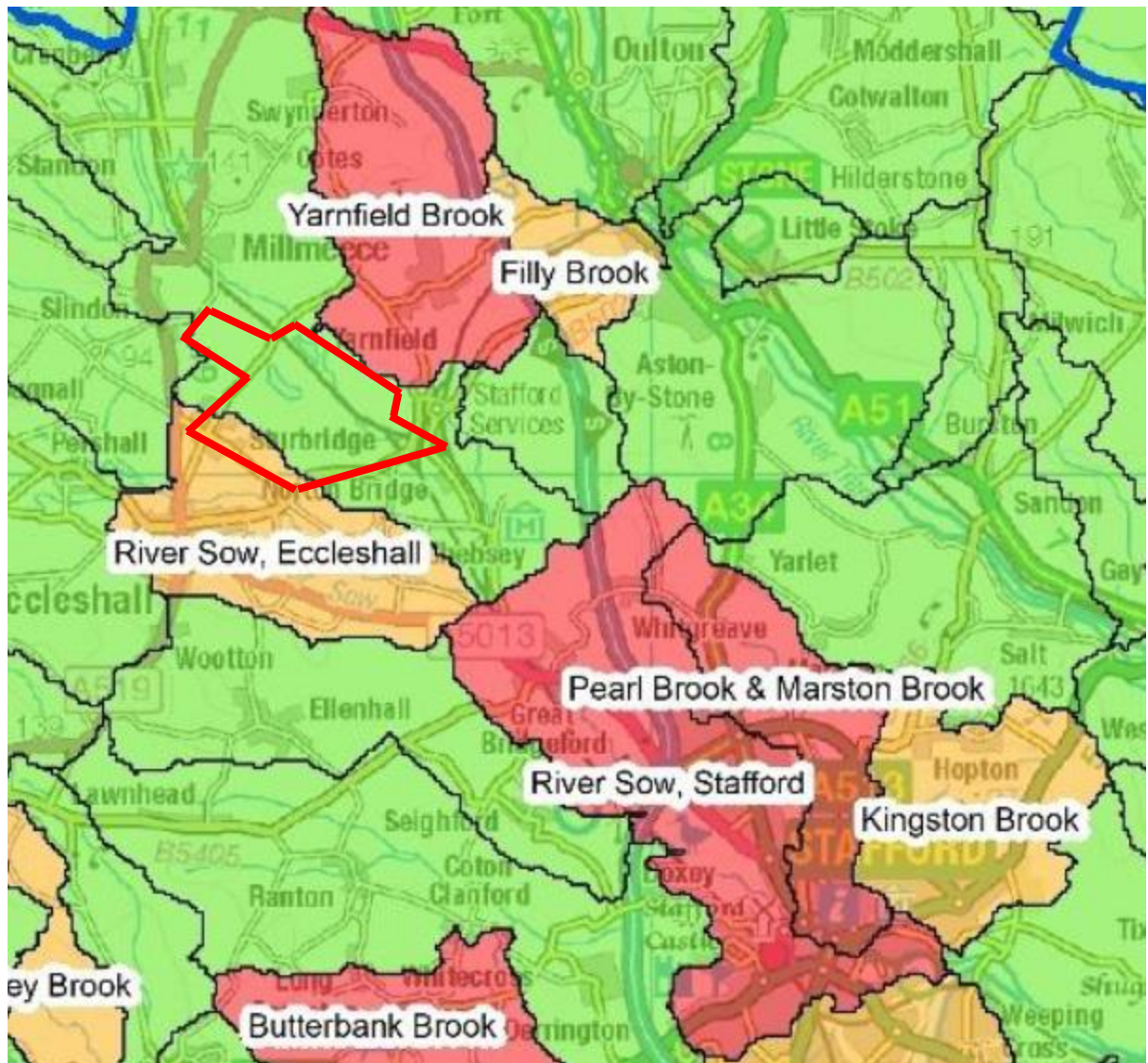
This land and any additional contingency land would be best left as a naturally flooding area as there would be a risk of moving flood water up or downstream of the Meece Brook and into the River Sow and as such moved out of the proposed development site.

The accompanying study – the Southern Staffordshire Councils Level 1 Strategic Flood Risk Assessment - document from 2019, which is the strategy authorities rely on to understand flood risk and the impact on planning shows significant areas of concern in the area of some of the proposed development and downstream, as follows :-

Figure 7-1 Final cumulative impact rating of catchments in Southern Staffordshire



2018c1642 - Southern Staffordshire SFRA Final Report v1.0.docx



The National Planning Policy Framework (NPPF) states “Strategic policies should be informed by a strategic flood risk assessment and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards”.

Given this and the increased incidence of flooding nationally (and globally), greater offset should be allocated for land to flood, as part of natural flood defences and land known to flood should be excluded from development.

The Indicative Concept Masterplan seems to allow for some of the flooded areas to be retained as green spaces, but whether sufficient has been allowed for the ongoing continued impacts of climate change and peak weather events is questionable and the Masterplan at this stage is conceptual at the moment in any case.

4. **Use of available brownfield land in the close proximity**

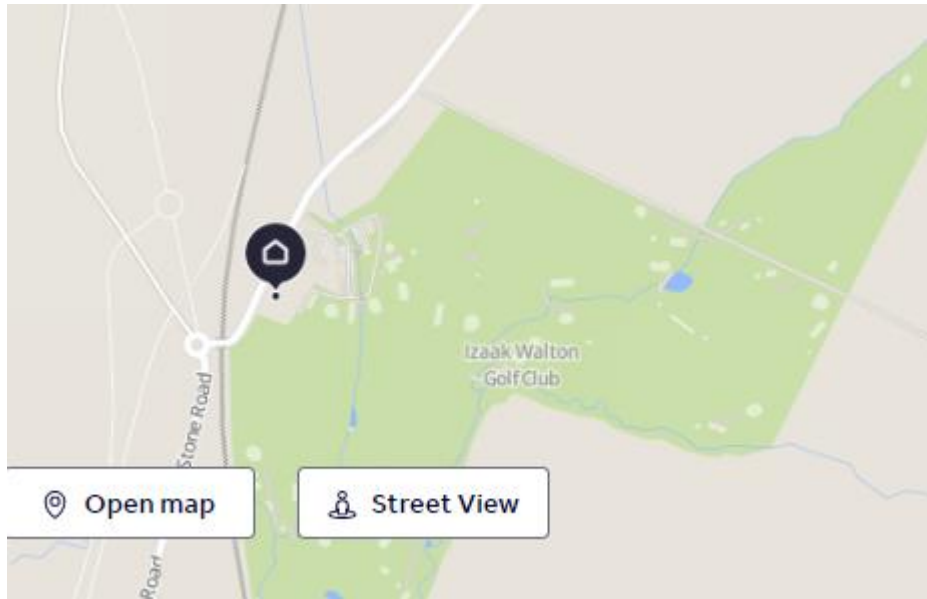
With the development of HS2 to the north, there may be better opportunities to collaborate with them and take over some of their redundant land after they have finished building the railway, so that a minimal amount of additional agricultural land is lost to housing development. This may make the notional boundaries slightly larger, but these could be developed out as individual pockets of housing and reduce the quantum proposed as part of the garden settlement.



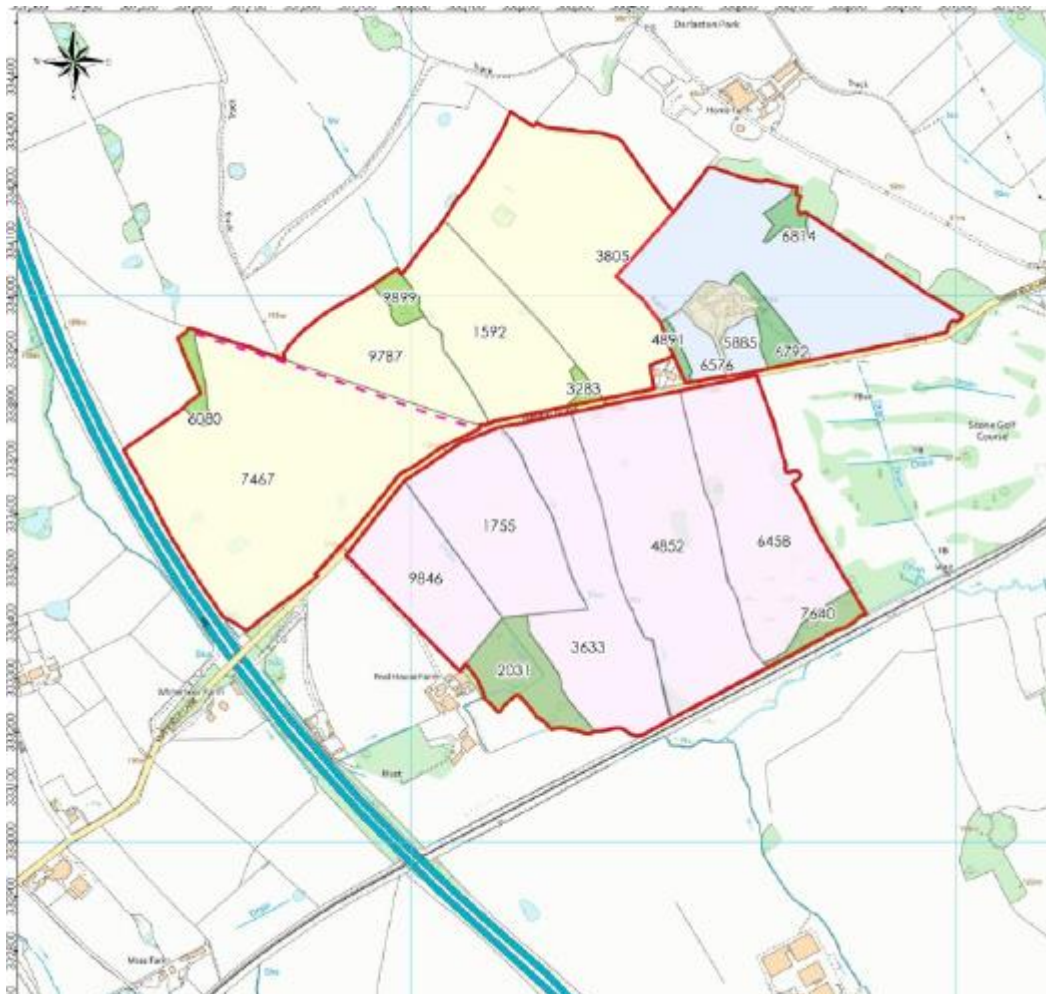
5. **Available brownfield land**

For settlements of this type to be successful, they need to be recognised and respected by the local community. Being fair to all parties is part of this. The development of 'available land' or brownfield land would resonate sensibly with this principal. Three such opportunities in that local area have been available in the last year or two, including :-

- Land at Izaak Walton Golf Club – approximately 118 acres
There is plenty of precedent where Local Planning Authorities have viewed golf courses as brownfield land and with falling memberships, provide logical alternatives to developing agricultural land – for example at North Somerset Council has stated that the 27-hole Woodspring Golf & Country Club, Reading Golf Club, Horwich Golf Club and Brackley Golf Course.



- Darlaston Grange Farm – approximately 200 acres (although in the North Staffordshire greenbelt)



- Bury Bank, bordering the A51 – 93 acres of Grade 3 land adjacent to the M6 motorway (although in the North Staffordshire Greenbelt)

Instead approximately 1,500 acres of a mix of Grade 2 and Grade 3 agricultural land is proposed for development :-



6. Impact on existing local communities

It is clear that there will be significant impact on the neighbouring existing communities – for example in terms of road use – and the infrastructure to handle the additional development needs to be built out first. For example at peak the settlement is likely to be a similar size to Stone and there is a dual carriageway that runs between Stafford and Stone, which also by-passes the town centres. This needs to happen to protect all the communities in the vicinity – for example Creswell, Great Bridgeford, Slindon, Chebsey, Norton Bridge, Eccleshall, Hanchurch, Yarnfield, Swynnerton, etc..

Significant thought also needs to go into route planning – for example there are existing highways pinch points at Little Bridgeford across the Worston bridge (which would be the ‘as the crow flies’ shortest route from Stafford to the southern tip of the development) – so that existing safety concerns can be mitigated upfront.

As otherwise, there could be significant impact on those existing communities and a Community Impact Assessment for all the communities within say a ten mile radius should be undertaken so that any negative impacts can be identified and mitigated.

Given the size of Stone and Eccleshall – and now the proposed garden settlement – whilst a West Coast mainline train station is to be welcomed, a new motorway junction on the M6 motorway – akin to a Junction 14a – should be committed to, given the proximity to the motorway and the desire to have employers relocating there. The best location for this would be the A51 road bridge over the M6, as this would reduce congestion at Hanchurch (junction 15) and bring benefit to surrounding towns like Stone and Eccleshall.

The Atkins Transport Study suggests as much :-

“Overall, it was found that the additional trips on the external highway network as a result of trips from Meecebrook Garden Community would still (despite the addition of the railway station) have a major impact even with the new railway station, and therefore potential mitigation solutions would need to be considered. This could include highway mitigation measures at key locations on the SRN (Strategic Road Network) (M6 Junction14 and 15).”

This would need to happen to ensure that the new settlement was not seen differently to the pre-existing settlements in the wider area, as this could cause the poor integration and acceptance of the new settlement.

7. Growing a Culture of Self Sufficiency – Vision 8

Vision 8 talks about : “In its earliest phases, Meecebrook will need to rely in part on its neighbouring settlements and to make use of what they offer”.

It is undoubtedly best to ‘piggy-back’ off existing facilities – like the local Primary School in Eccleshall and Primary Care Facilities – but that is only possible if there is existing capacity in these services and certainly the Primary School is at capacity and the Crown Surgery already has an 8,000 patient register, which is the recommended level for Primary Care facilities and short of moving to a new set of facilities – for both – they could not accommodate this aspiration.

The Local Plan supporting documents say as much, as evidenced by the Strategic Housing Land Assessment of sites (page 59 as an example of a site assessed in Eccleshall) :-

SHELAA ID Code: ECC06

Site Name: Land between Stone and Stafford Road

Adjoining / nearby settlement: Eccleshall

Ward: Eccleshall

Parish: Eccleshall

Greenfield or Brownfield: Greenfield

Potential Yield (dwellings): 468

Site Size (hectares): 26

Site Selection Assessment

Topic Area	Evaluation
Education	Primary School: Bishop Lonsdale CE Primary Academy. Limited capacity to accommodate further new houses within Eccleshall, and school cannot be expanded. Secondary School: Sir Graham Balfour High School. Development cannot be accommodated within existing capacity; school cannot be expanded.
Transport	Two access points required. Consider new bus service. Perimeter road across site to form bypass to east of Eccleshall. Accessibility Score: 3/6
Ecology	Medium / Low overall ecological sensitivity. Red Great Crested Newt risk impact zone.
Landscape	High / Medium overall landscape sensitivity.
Heritage	Low direct impacts, Medium setting impacts. No substantial harm.
Water	Medium potential impact on sewerage infrastructure. Low potential impact on surface water sewerage infrastructure.
Electricity	No issues for this site.

Outcome of Assessment: Rejected Site

Reasoning: Education capacity constraints are unlikely to be able to be resolved. Additionally, landscape concerns would need to be suitably mitigated for.

Equally this aspiration will drive up the use of local trips – presumably in the car – and this should be avoided at all costs. So this aspiration whilst pragmatic does not follow ‘an infrastructure first’ approach, which is what should be the aspiration instead. Equally with 300 homes being built out a year, by the time the school is ready, if it was started at the same time as the first house, it will already have a local demand, like the school being built on Marston Grange for that 500 home development.

8. Location of Renewable Energy – Wind Farm

Currently government policy is against onshore wind farms and locating this on the MOD land, which borders the north of the site, would on the one hand enhance the site’s green credentials but on the other is not the best location for wind, according to local land owners, and secondly detract from the new settlement. It is currently principally woodland, so removing trees to install a windfarm seems counter-intuitive.

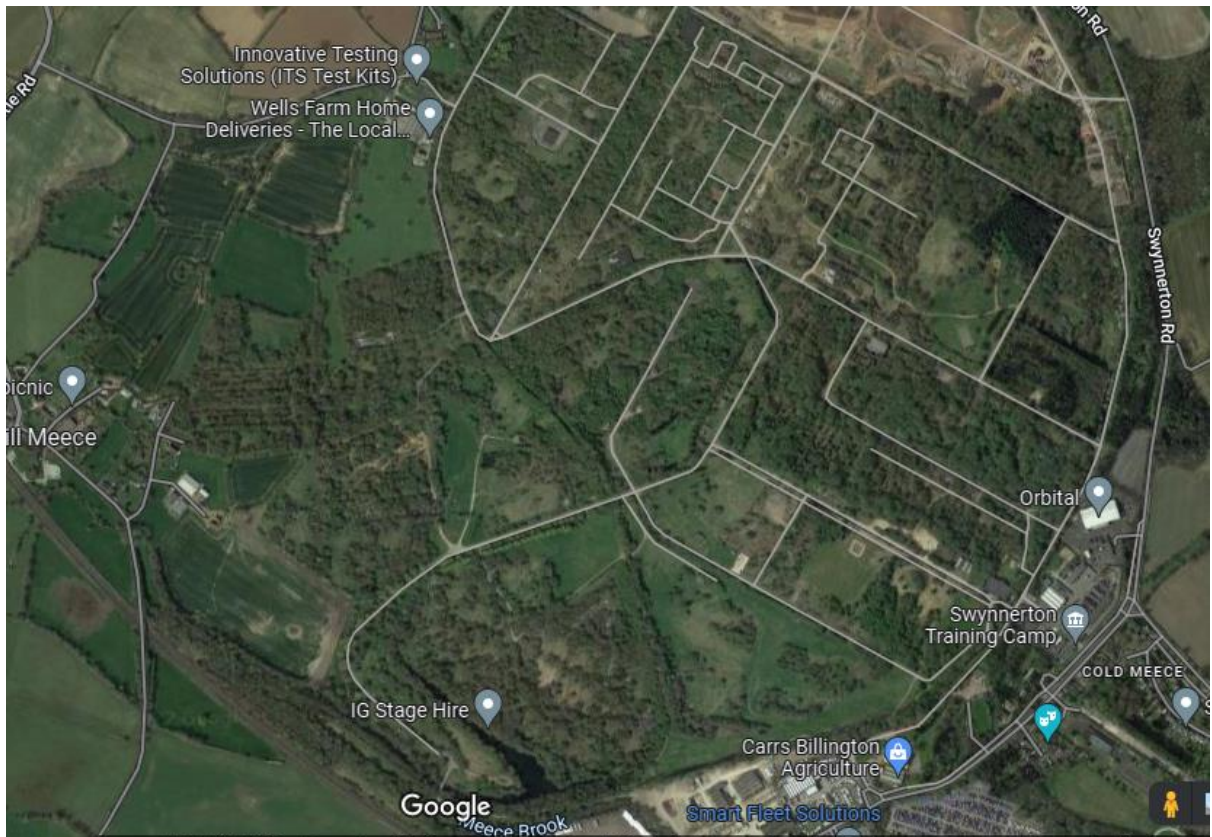
According to the most suitable land for wind farms, it would include ‘the tops of smooth, rounded hills; open plains and water; and mountain gaps that funnel and

intensify wind'. Wind resources are generally more favourable for electricity generation at higher elevations above the earth's surface.

So this would seem entirely the wrong location



[England topographic map, elevation, terrain \(topographic-map.com\)](http://topographic-map.com)



[Google Maps](https://www.google.com/maps)

9. Location of Renewable Energy – Solar Farm

The proposals include a proposed location for a solar farm and whilst a solar farm would exhibit the garden settlement’s green credentials – the land chosen would seem to be part of an area that is currently prone to flooding.

Given this, it is unclear whether the concept master plan aligns fully with this aspiration.

10. Linking Up Green Spaces

The development of a corridor of green spaces linking the new garden settlement to the pre-existing communities would be a sensible approach to try and integrate the communities, so a ‘green’ country park with public access north of the Stone Road in Eccleshall linking into the Garden Settlement would provide that link.

A similar link into Chebsey, Norton Bridge, Slindon, Yarnfield and Swynnerton would encourage walking and cycling and the enjoyment of the wider natural environment and places that people might naturally want to go.

11. Mandatory Housing targets

Given the removal of mandatory Housing Targets as part of the Levelling-up and Regeneration Bill, this would reduce the build out requirement to @ 1,000 new houses in a new settlement as part of the Local Plan period (2020 – 2040).

This would impact on the analysis undertaken as part of the “David Carlisle Report on Stafford Borough’s Strategic Development Site Options (10th December 2019) and the AECOM report : Stafford Borough Strategic Development Site Options - Reasonable Alternatives Study, in particular the conclusion assessment :-

Table 13 High level assessment against NPPF criteria to indicate options with the potential to be most suitable

Strategic Growth Option	Potential for sustainable access	Potential for walkable neighbourhoods	Potential to enhance or maintain vitality of rural communities	Potential to integrate housing, economic and community uses	Other notable factors	Overall potential
A1 Gnosall North/East	Proximity to some services in Gnosall but car use likely to access existing employment areas. (A)	All development at this scale offers potential to design facilities within walking distance of properties. (G)	Potential positive impact on supporting services in Gnosall. (G)	Scale limits potential to mix uses, although some existing to integrate with. (A)	n/a	Potentially suitable.
A2 Land between Gnosall and Haughton	Proximity to some services in Gnosall and Haughton but car use likely to access existing employment areas. (A)	All development at this scale offers potential to design facilities within walking distance of properties. (G)	Potential positive impact on supporting services in Gnosall. (G)	Scale limits potential to mix uses, although some existing to integrate with. (A)	n/a	Potentially suitable. Careful consideration required if Gnosall North/East is allocated and proximity to Haughton, due to the coalescence risk.
B Seighford	Limited potential for sustainable modes, but helped by proximity to Stafford and Ladfordfields Industrial Park. (A)	All development at this scale offers potential to design facilities within walking distance of properties. (G)	Seighford has limited services with potential for being supported. (A)	Scale provides potential to mix uses, and good proximity to existing economic uses. (G)	Limited waste water capacity (~500 homes).	Potentially suitable.
C Land North of Redhill	Some potential for sustainable travel, related to the adjacent North of Stafford Strategic Development Location and links back into Stafford. (A)	All development at this scale offers potential to design facilities within walking distance of properties. (G)	No facilities of note within walking distance at present. (R)	Scale provides potential to mix uses, and potential to align with future facilities at North of Stafford.	Currently remote from some of the utility network. Site is encircled by gas pipelines, M6 and A51.	Potentially suitable.
D Meecebrook	Potential for new railway station is the key to the possibility of sustainable access. (G) Close proximity of employment at Cold Meece.	All development at this scale offers potential to design facilities within walking distance of properties. (G)	Yarnfield has limited services with potential for being supported. (A)	Scale provides potential to mix use, including integration of existing employment areas. (G)	Much of site is previously developed land, currently being used by MoD. Limited wastewater capacity (~3000 homes).	Potentially most suitable depending on provision of new railway station and M6 junction, and confirmation of site availability within plan period.
E Hixon	Potential for new railway station is aligned with proximity of Airfield Industrial Estate. (G)	All development at this scale offers potential to design facilities within walking distance of properties. (G)	Hixon has limited services with potential for being supported, although the other side of the industrial estate. (A)	Scale limits potential to mix uses, although the exiting industrial area facilitates integration. (A)	Former airfield with temporary uses.	Potentially most suitable depending on provision of suitable public transport solution/new railway station. Careful consideration required if Land East of Weston is allocated due to coalescence risk.
F Land East of Weston	Potential for new railway station. Relatively close to employment at Airfield Industrial Estate. (G)	All development at this scale offers potential to design facilities within walking distance of properties. (G)	Weston has limited services with potential for being supported. (A)	Scale limits potential to mix uses, and limited existing to integrate with. (R)	High flood risk to the east of the site.	Potentially suitable. Careful consideration required if Hixon is allocated due to coalescence risk.

And it should be noted that Hixon faired as a ‘potentially most suitable’ location, capable of taking @ 2,000 homes or Seighford (@ 500 homes) amongst others.

This approach would not negate the development of a Garden Community at Meecebrook in due course, as part of further Local Plans in the future, when the brownfield land at the MOD were to become available, which was the original concept conceived.

Site Allocation Policies

Policy 15. Stone Countryside Enhancement Area

Yes / No

Policy 15 Comments:

It would be great to see the development of the concept of Countryside Enhancement Areas, into for example other settlement hierarchies, for example those at Tier 4, particularly where they can enhance existing wetland or footpaths, like in Eccleshall Parish.

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 / No

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:

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:

In many communities, especially in rural communities, the duration of tenure is significant, demonstrating in the main that people are buying into family homes with young families in areas that they want to live in long term, but over time when the children grow up and move into their own houses, this leaves parents with a link to their local community and services, but a limited ability to find attractive smaller private residential housing. This catches them in a trap, difficult to resolve, particularly as comparatively the homes are not expensive to stay in after prolonged tenures.

Developers on the other hand don't like building bungalows because they affect yield and the developer's margin.

If a more pragmatic approach was taken to 'space about dwellings' for bungalows, with less 'dedicated owner-occupier space' and more 'communal space', this could allow for both issues to be proactively resolved and in so doing free up valuable 3 and 4 bedroomed houses in local communities.

I would advocate a move to a different space about dwellings / space standard for the development of sites with attractive new market sale bungalows.

Policy 24 – E
Paragraph 24.4

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:

Policy 25 – Rural Exception Sites

The Policy in principal is acceptable.

However a more robust approach needs to be taken to prevent the abuse of developing rural exception sites, for them to be later turned into market housing. This in certain cases currently allows for the development of homes in locations that would otherwise be unacceptable.

However, with a more robust policy for Rural Exception Sites that are no longer needed, these should automatically revert to affordable general needs housing in perpetuity.

This approach would maintain the support for rural exception housing and also the local community and be open to anyone eligible to apply for, if the agricultural tie was no longer required in time.

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:

Policy 42 – Flood Risk

As can be evidenced by the change in climatic occurrences – where dry spells are longer and periods of rainfall often more concentrated. Building new homes on areas potentially at risk of flooding, will only become increasingly at risk as the impacts of climate change occur, which is difficult in itself but doubly difficult when things like householder insurance gets refused.

The Town and Country Planning Association (TCPA) would recommend improved attention to detail on the future flood risks that climate change will bring. These need to be factored into any development upfront, rather than reacting to the flooding in time.

In addition, the mitigation factors of flood need to be modelled over greater areas so that flooding and flood risk is not just moved up and / or downstream of a known location.

Historic flood events should be sufficient an evidence base to refuse any planning application involving development, unless significant improvement measures are included to remove the historic flooding as well as the risk to the new development. It should not be acceptable to target a position of 'no worse an impact through development', given the impacts and the worsening trajectory going forwards.

Policy 49 – Trees

This should be welcomed, as Birmingham University (BiFORS Face) and climate change researcher – Jo Bradwell – have sufficiently evidenced that the planting of as many mixed native species trees (or near neighbours) improves growth as well as active woodland management, like pollarding and the coppicing of woods, which needs to be part of a standard practice, with monoculture planting being avoided at all costs.

Coppiced woods should be replaced, as part of a regular woodland management approach.

Other carbon capture planting – like selective herbal leys, as part of meadow-land management – should also be encouraged as part of these environmentally aware – and climate conscious policies.

POLICY 46. Green and blue infrastructure network

Whilst the policies to improve the green and blue infrastructure network are welcomed - as ones promoting health and wellbeing - those that detrimentally impact on health and wellbeing should also be included – for example those restricting the number of takeaways in a given area, not so as to restrict choice and freedom of choice, but to protect health and wellbeing – i.e. it is about balance.

In the same way, sensitive locations, like close-by schools should be avoided for certain establishments, including but not limited, to takeaways.

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:**POLICY 53. Parking standards**

The policy proposed does not go far enough to ensure that Electric Charging Points are installed at the time of any works.

As such it is recommended that all conversion, extension or development of any building in the Borough in the Plan period should require the provision of at least one EV Charging Point, unless it can be shown that one already exists or that to provide one would be unnecessarily burdensome, in terms of works or cost (i.e. more than 10% of the total cost of works to be undertaken per dwelling).

Included in this would be the lack of availability of sufficient EV charging capacity in the local grid.

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.

From: Preferred Options Consultation [REDACTED]
Sent: 12 December 2022 11:21
To: Strategic Planning Consultations
Subject: Preferred Options Consultation - Submitted Response

Full name: **Mark Winnington**

Email: [REDACTED]

Statutory Bodies and Stakeholders

Organisation or Company: **SB council. SC Council**

Age: [REDACTED]

Added to database: [REDACTED]

Topics (Contents page): **General Comments**

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: **Not asked**

Comments: **Not asked**

Site Allocation Policies

Q4 - Do you agree with the proposed allocations?

Policy 9 (North of Stafford): **Not asked**

Comments: **Not asked**

Policy 10 (West of Stafford): **Not asked**

Comments: **Not asked**

Policy 11 (Stafford Station Gateway): **Not asked**

Comments: **Not asked**

Policy 12 (Other housing and employment land): **Not asked**

Comments: **Not asked**

Site Allocation Policies (continued)

Q5 - Do you agree with the proposed allocations?

Policy 13 (Local Green Space): **Not asked**

Comments: **Not asked**

Policy 14 (Penk and Sow): **Not asked**

Comments: **Not asked**

Policy 15 (Stone Countryside): **Not asked**

Comments: **Not asked**

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: **Not asked**

Comments: Not asked

Q7 - The Stafford Borough Plan proposes policies around the town centres uses, agriculture and

forestry development, tourism development and canals. Do you agree? **Not asked**

Comments: **Not asked**

Housing Policies

Q8 - The local plan proposed a policy (23) on affordable housing. Do you agree? **Not asked**

Comments: **Not asked**

Q9 - The local plan proposes a policy (30) to help meet identified local need for pitches for Gypsies and Travellers. Do you agree? **Not asked**

Comments: **Not asked**

Q10 - The local plan proposes policies around homes for life, rural exception sites, new rural dwellings, replacement dwellings, extension etc. Do you agree? **Not asked**

Comments: **Not asked**

Design and Infrastructure Policies

Q11 - Do you agree with policies? **Not asked**

Comments: **Not asked**

Environment Policies

Q12 - Do you agree with policies? **Not asked**

Comments: **Not asked**

Connections

Q13 - Do you agree with policies? **Not asked**

Comments: **Not asked**

Evidence Base

Q14 - Have we considered all relevant studies and reports? **Not asked**

Comments: **Not asked**

Q15 - Do you think there is any further evidence required? **Not asked**

Comments: **Not asked**

General Comments:

I have attended the consultation evening (Gnosall) and seen all of the documentation offered up. I am very concerned that as a Village, Gnosall has already taken the burden of development as a "Key Village". There is much locally evidenced concern that the local

seVICES, school, doctors etc are full to capacity. whilst i realise that other issues affect and put pressure on community resilience, i do not recognise that Gnosall needs more residential properties. i am therefore objecting to the development proposed off lowfield lane/A518. I also feel that mention is made for the need for low number locally approved rural housing and rural businesses in the Borough of Stafford.

From: Burgess, Sarah (EXT) [REDACTED]
Sent: 09 December 2022 13:28
To: Strategic Planning
Subject: Local Plan Preferred Options - CPRE Staffordshire response
Attachments: CPRE Staffordshire response to Preferred Options.pdf

Dear Sir/Madam,

Please find attached representations from CPRE Staffordshire, the countryside charity, on the Stafford Borough Local Plan Preferred Options consultation.

Kind regards,

Sarah Burgess



Sarah Burgess

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

<http://www.cprestaffordshire.org.uk/>



Registered Charity Number 219443

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Background

These representations on the Stafford Borough Local Plan 2020-2040 – Preferred Options Consultation Document – November 2022 are made by CPRE Staffordshire (Campaign to Protect Rural England), registered charity number 219443. CPRE promotes and encourages the protection and enhancement of the countryside of Staffordshire, its towns, villages and rural environment.

We are pleased that you are making good progress on revising the current Local Plan and extending its end-date to 2040.

Thank you for notifying us of the consultation. Our response below follows the Council's ordering of sections.

Our representations on the consultation are summarised below. Our representations have been updated from those to the Issues and Options consultation of 2020. More detailed representations are made in the Appendices.

Spatial Portrait

Preferred Options

Addition of Key Issues and Challenges, now a mixture of statements with some quasi-policy comments.

HS2 comments are still potentially misleading and inadequate. It should be made clear that HS2 passes through the borough. A major railhead has been approved between Yarnfield and Stone, but this is not even mentioned.

Development Strategy and Climate Change response

We oppose, in major ways, Policy 1:

- We see no case for the number of new homes proposed (see Appendix A).
- There is no justification for the provision of over 80 hectares of new employment land.
- We are opposed to the development of Meecebrook which is now indicated to be primarily on greenfield and is wholly unjustified (see Appendix B).
- There is no need for additional greenfield housing allocations.
- The allowance for windfalls is unjustifiably low (see Appendix C)
- We disagree with the spatial distribution of new housing.
- We see no justification for the new site allocations on greenfield land under Policy 12.
- We are opposed to the greenfield development now called Meecebrook (see Appendix B).



In relation to the text below Policy 12:

- We oppose the significant uplift in housing number from the those in the New Standard Method. (Paragraph 1.2)
- We oppose the additional allowance of 2000 homes as being wholly unjustified. (Paragraph 1.3).
- We oppose the greenfield development of 3000 new homes at Meecebrook in the plan period. (Paragraph 1.4)
- We oppose the intended commitment of a further greenfield development of more than 3000 new homes at Meecebrook after the plan period. (Unstated but clearly intended.)
- We oppose the EHDNA projection as being too high and are even more opposed the proposed 50% uplift to the provision of employment land in the plan period. (Paragraph 1.4)

From the representations above it will be apparent that we see no justification for new greenfield sites at Stafford, Stone, Meecebrook and the villages of Tier 4 (see Appendix A).

Policies

Policy 4 Climate Change

Support.

Policy 5 Green Belt

Support.

Policy 6 Neighbourhood Plans

We see difficulties e.g. at Stone, Gnosall and Woodseaves.

Policy 7 Meecebrook Site Allocation and Policy 8 Masterplanning and design

We are opposed - see Appendix B.

Policy 9 North of Stafford

Policy 10 West of Stafford

Existing Allocations

Policy 11 Stafford Station Gateway

Please refer to [our previous response](#) to the specific consultation.

Policy 12 Other Housing and Employment Land Allocations

Opposed to further Greenfield development - see Appendix A.

Policy 13 Local Green Space

No comment

Policy 14 Penk and Sow Countryside Enhancement Area



Support

Policy 15 Stone Countryside Enhancement Area

Support

Policy 16 Protection of Employment Land

Support

Policy 17 Recognised Industrial Estates

Support

Policy 18 Home Working

Accepted

Policy 19 Town centres

Meecebrook is not supported.

Stafford Town Centre is of real concern due to record vacant floorspace including Guildhall Centre, the former Co-op building, former M&S and many others.

Policy 20 Agricultural and Forestry development

We are aware of the difficult balance.

Policy 21 Tourism Development

From cases elsewhere in the county we have concerns that Policy B is too loose.

Policy 22 Canals

Support

Policy 23 Affordable Housing

We regret the failure to deliver on the previous policy and oppose the reduced requirements of the proposed policy.

Policy 24 Homes for Life

We strongly support this policy and regret that the Council dropped this policy in the current Local Plan.

Policy 25 Rural Exception Sites

We appreciate the difficulties caused by the Council's interpretation of its current policy, as found in the appeal at Saddler Avenue in Stone.

We regret that so few homes (if any?) have been built under the current policy.

Policy 26 New Rural Dwellings

Despite an apparently restrictive policy, many new dwellings are permitted and seem to be built.

Policy 27 Replacement Dwellings



Despite policy, small cottages seem to be replaced by mini-mansions.

Policy 28 Extension of dwellings

Policy is too generous in C.

Policy 29 Residential sub-division and conversion

We have insufficient knowledge on these policies.

Policy 30 Gypsy and traveller accommodation

We have insufficient knowledge on these policies.

Policy 31 Housing mix and density

We oppose further unnecessary greenfield housing. The policy is generally very vague and difficult to use in practice.

Policy 32 Residential Amenity

Supported.

Policy 33 Extension to curtilage

Support.

Policies 34 to 45

Support.

Policy 46 Green and blue infrastructure network

We regret that although over 6000 new houses have been built in the current plan period no new playing fields have been provided for their 14,000 residents. We support the Borough Council's intentions in this policy.

Policy 47 Biodiversity

We strongly recommend that A and B are amended and strengthened to require the 10% net positive gain to be provided within a stated distance of not more than 5 miles from the site. Without this in the Policy, net gain could be provided anywhere in England and would be virtually impossible to enforce.

Policy 48 Cannock Chase SAC

Supported.

Policy 49 Trees

We regret the major loss of hedgerows in almost all new developments in the Borough with virtually no replacement. The policy is very weak.

Policy 50 Pollution

Supported.

Policy 51 Air quality

Supported.



Policy 52 Transport

It is regrettable that in most new developments Stafford Borough Council has failed to achieve the objectives of this policy.

Policy 52 Parking Standards

It is regrettable that Stafford Borough Council has failed to achieve the objectives of this policy in most new developments

Appendix A

The amount of new housing proposed

Summary

Over the 20 years of the Plan the Government's requirement, using the New Standard Method, is for the provision of 391 houses per year, giving a requirement for 7820 dwellings over the 20 year period.

However, the Preferred Options document proposes the development of 12580 new dwellings over the plan period (see Table 1). This total includes an addition of 2000 dwellings to provide for additional migration, above that already built into the Government's New Standard Method, presumably to allow the Council to try to justify the development of a new settlement at Meecebrook.

The remaining number of 10,580 new homes is assumed to relate to Stafford Borough's requirements. (We also consider that the numbers seriously underestimate 'windfalls'.)

Accepting the Council's proposed numbers in Table 1, but completely excluding Meecebrook, the numbers proposed would still exceed the Government's New Standard Housing Method requirements by 2760 (10580 – 7820).¹

We consider that the proposals for additional housing numbers are fundamentally unsound and Meecebrook is unjustified and unnecessary to meet any of the housing requirements of Stafford Borough in the current plan.

¹ Note: we recognise that in Paragraph 1.2 the Council referred to an alternative employment growth method from Lichfields which indicates a number of 435 dwellings per year.

Housing numbers

Current Adopted Plan 2011 to 2031

In the current statutory Local Plan 2011-2031, adopted in June 2014, the Council says:

“6.11 With regards to the future demand for new housing in the Stafford Borough area, national statistics from the Government provide information on population growth forecasts and the number of new households likely to form. For Stafford Borough, the latest 2010 population projections show an increase of 19,900 residents from 126,100 to 146,000 people in 2035. These figures include natural change and migration from other areas. The 2008 household projections to 2033 showed an increase of 11,523 households, from 52,999 to 64,522 households who will be looking for houses in our area. This is an average of approximately 461 new houses per year over the period 2008 to 2033. **However the 2011 interim household projections covering the period 2011 to 2021 identify an increase from 55,706 in 2011 to 59,874 in 2021, which is an average of approximately 417 new houses per year.**

6.12 **It should be noted that the household projection figure is made up of ‘local need’ (i.e. natural change: the balance of births over deaths and reduction in average household size) and ‘in-migration’ elements, with the split for Stafford Borough being approximately 30% local need and 70% in-migration mainly from surrounding areas, the majority being from Cannock Chase District, South Staffordshire District and the City of Stoke-on-Trent. The Government, through the NPPF, has stated that local authorities should provide for the locally assessed requirements of their area. Pressures for continued in-migration are likely to remain from neighbouring areas in the short to medium term. In light of meeting objectively assessed needs it is sensible to plan for these, not least because it is consistent with the growth aspirations for Stafford town, and its developing sub-regional role, as set out in the Spatial Vision and Key Objectives earlier.” (Our emboldening.)**

We have failed to find any local authority, neighbouring or elsewhere which has asked, acknowledges, or has made, a reduction in their housing requirements due to migration of households to Stafford Borough.

Housing Delivery

Stafford Borough Council has exceeded, and continues to substantially exceed the numbers of houses proposed in the Plan (500 per year) principally because it made no allowance for ‘windfall’ housing. Numbers of new houses



completed from 2011 to 2022 have averaged over 600 per year² – 20% over the Plan’s intentions³.

New Housing numbers 2020 - 2040

The Government’s New Standard Method

Lichfields, Stafford Borough Council’s consultants, explain the Standard method for local housing needs⁴ as follows:

The introduction of a standard method for assessing housing needs for planning purposes (first consulted on in 2017, then adopted in 2018) intended to shift time, resources and debate at examination away from the ‘numbers’ question and towards the ‘how’ and ‘where’ of building new homes...

The New Standard Method includes both local need and migration assessments.

Most councils in England use the Government’s New Standard Method as the basis for housing numbers in their Local Plans. Locally, in their most recent plans, the adjacent authorities ahead of Stafford in plan preparation (Lichfield Council - Examination in Public, and South Staffordshire Council - Regulation 19 Publication for Submission to Inspectorate for Examination in Public) have both used the Government’s New Standard Method for their housing calculations.

In the Preferred Options document the Council says in Paragraph 1.2 “ ..the minimum figure for local housing need set by national guidance (calculated in accordance with the standard methodology outlined in the Planning Practice Guidance) of 391 new homes per year (2022)”. Over the plan period 2020 – 2040 this would give a total new housing requirement of 7820.

We think that the Government’s New Standard Method is the most appropriate baseline to use⁵.

² Land for New Homes – the Housing Monitor 2022 SBC.

³ The overprovision of housing before 2020 is not taken account of in the new plan.

⁴ Standard method for local housing needs April 2022.
<https://lichfields.uk/standard-method-for-local-housing-needs-april-2022/>

⁵ Note: we recognise that in Paragraph 1.2⁵ the Council referred to an alternative employment growth method from Lichfields which indicates a figure of 435 dwellings per year. This would give a housing total of 8700 over the plan period.



The countryside charity
Staffordshire

New Housing Allocations

Allocation totals

We have added the number of houses in each of the proposed allocations in Policy 12A which totals 1379 new homes. We have seen the note to the table in the Policy but consider it almost certain that additional school provision can be made in the plan period as part of the development of the nearby Land North of Stafford Strategic Housing site, which includes schools on the site.

We cannot explain why the Allocations from Policy 12 is given as a total of only 885 in Table 1 (Sources of housing supply) on page 22. (Adding the Housing Allocations in Policy 12A on pages 54 and 55 gives a total of 1379.)

We assume that the list of housing allocations included on the Preferred Options is correct and that these are as mapped.

Allocations Proposed

We have read the list of proposed allocations for housing in Policy 12A.

Stafford

We see no case for the allocation of another Greenfield site beyond the boundary of Stafford at Ashflats, South of Stafford.

We are not objecting to the other allocations at Stafford, which involve brownfield sites.

Stone

All but two of the proposed allocations on sites at Stone are Greenfield on the periphery of the town, in countryside to the south and west of the site. Two of the other sites are outside the established development boundary but are also Greenfield.

We see no justification for these allocations which involve the inappropriate and unnecessary loss of Greenfield.

We are not opposed the development of brownfield sites in Stone.

Larger Settlements

Tier 4 larger settlements of Barlaston, Blythe Bridge, Eccleshall, Gnosall, Great Haywood, Haughton, Hixon, Little Haywood and Colwich, Meir Heath/Rough Close, Weston, Woodseaves and Yarnfield.

Gnosall



We fail to understand why there is any justification for yet another edge of village, Greenfield, site allocation, for 100 homes, at Gnosall which has experienced significant new housing development in the current Adopted Local Plan 2011-2031.

We oppose the proposed allocation.

Woodseaves

We are perplexed⁶ by the apparent lack of justification for the allocation of 5 sites at Woodseaves, including a Greenfield site for 88 houses on the edge of the village and a total allocation of 125 homes. Woodseaves is one of the smallest villages in the Tier 4 list of 12 settlements.

We see no case for greenfield housing allocations at Woodseaves. In general, small housing sites for genuine local need in rural settlements would be covered by the Council's Rural Exceptions policy in its current adopted plan - which would apply across the Borough. We are not aware of any rural exception housing being approved in rural villages in Stafford Borough.

Note:

We did not find that the Revised Settlement Assessment and Profiles Topic Paper (Preferred Options Stage) was helpful in explaining the allocations at Gnosall and Woodseaves.

Summary

We cannot see a case for the additional greenfield housing allocations including at Meecebrook New Town.

Even without the allocations referred to above, Stafford Borough Council will exceed its requirements by a considerable margin - as evidenced by our representations on Housing Land Supply, windfall allowances, housing allocation numbers etc.

We consider that to propose Meecebrook at this stage is inappropriate. At present it is unjustified, and relevant information on phasing, funding, viability affordable housing, as well as infrastructure needs and costs, has not been made available.

Note:

⁶ We are aware of the abandonment of the Neighbourhood Plan in the light of the Inspector's questions to the Parish and Borough Councils.

In general, small housing sites for genuine local need in rural settlements would be covered by the Council's Rural Exceptions policy in its current adopted plan - which would apply across the Borough. We are not currently aware of any rural exception housing having been approved in rural villages in Stafford Borough.



Appendix 9 reads:

“Meecebrook Garden Community concept masterplan, design and development principles and infrastructure delivery schedule These documents are under preparation and will be included at the Regulation 19 stage after the preferred options consultation.”

We think that this approach, to produce additional relevant new information at the very last stage before the Examination in Public is not in accordance with good practice and could be seen as an abuse of process.

Appendix B

Meecebrook New ‘Garden’ Town/Village/Community/Settlement

We do not consider that Meecebrook can be justified by the need to deliver additional housing and employment land in the Borough; for the reasons given in the representations above.

We have found no evidence to support the additional housing numbers (more than 6,000 homes are referred to in the Preferred Options) put forward to justify including the new town in the Plan proposals.

The plan appears to include a land area larger than that of Stone with potentially a similar population to that of Stone.

We have not found any reference to the area (amount) of land included in the proposal, or the amount of this which is greenfield, or the proportion of the area which is currently in agricultural use.

Neither Staffordshire County Council, which is reported to be supporting the new town, nor Stafford Borough Council has indicated in the published how much they already have contributed and intend to contribute in the future to the promotion and development on the new town of Meecebrook and the cost to taxpayers.

The Government agreed to include the proposal for a new settlement of 10,000 new homes at Meecebrook, which was announced by the Ministry of Housing and Local Government in March 2019⁷ in its list of five new towns that ‘will receive a share of £3.7 million of funding to fast-track specialist survey work and planning works necessary for each new town’s development’. Stafford Borough Council has reported that it has “received over £1million of government funding to help with this opportunity, supporting the development of visionary and evidence based documents.”⁸

It is reported that:

“The concept of locating a new settlement at Coldmeece is not a new one and has been mentioned since munition production at MOD Swynnerton ceased after WW2. The concept for this new settlement was revisited in 2015, gaining further momentum when it was included

⁷ Press release. £3.7 million to fund 5 new garden towns across the country
<https://www.gov.uk/government/news/37-million-to-fund-5-new-garden-towns-across-the-country>

⁸ <https://www.staffordbc.gov.uk/meecebrook-new-garden-settlement>



in the HS2 inspired Constellation Partnership Growth Strategy which was submitted to Government in early 2017”⁹

The WW2 munitions factory, a brownfield site, which was included in the proposal put to Government in the funding bid, has now been removed from the proposals. However, no reason has been given for this. The proposed site is now predominantly greenfield.

Although the scheme has been developed over a number of years, with a great deal of money spent on staff time, consultants and other costs, there still seems to be no evidence presented to demonstrate that the new town is viable or deliverable as proposed.

From what has been presented to the public we consider that evidence has not been presented to demonstrate that:

- The new town has the support of neighbouring authorities or those in the wider region;
- The proposal has the support of more than 10% of residents within 10 miles of the town;
- The Council has apparently not given any consideration to phasing of the proposed development of the new town and this is not referred to in the Vision Document and Masterplan prepared by JTP¹⁰ for the Council;
- Network Rail may not previously have been consulted on the construction of a new station as proposed;
- How many trains would use the station, if/when a station would be built, how/when it would be committed to and how it would be funded, its cost and its future viability – this is only partially covered by the Meecebrook Rail Study – Pre-feasibility Report¹¹;
- “Meecebrook’s vision will be for a garden community that is sustainable in all forms by reducing carbon use and being a self-sufficient community”¹² - but no detail is given of how this will be achieved.
- The impact of significantly increased traffic on places such as Yarnfield and Eccleshall does not appear to have been considered by the Borough Council, any of its consultants or Staffordshire County Council as Highway Authority.

⁹ Planning Context Page 10

<https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Development/Meecebrook/Meecebrook-Vision-Accessible.pdf>

¹⁰

<https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Development/Meecebrook/Meecebrook-Vision-Accessible.pdf>

¹¹

<https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Development/Meecebrook/Meecebrook-Rail-Study-Pre-Feasibility-Report.pdf>

¹²

<https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Development/Meecebrook/Meecebrook-Leaflet-Accessible.pdf>



- The highways infrastructure needs, the location and nature of the improvements required, the cost of the works and how they are to be funded have been considered;
- The provision of public transport in the new town has been considered;
- The location and cost of new sewage treatment facilities (now generally called water reclamation works) - and how they will be phased and funded;
- The provision of a water supply - and how it will be funded;
- The avoidance of increased flooding;
- The cost of new schools (primaries and secondary - or three tier) – their phasing and how they will be funded;
- The cost of construction of surgeries for doctors, dentists, other health workers – their phasing and how they will be funded;
- How new retail facilities are to be provided and how it can be ensured, in practice that they will be built and brought into use when required.;
- How the open spaces, public playing fields, community buildings and similar facilities are to be provided, laid out, phased and paid for. How subsequent maintenance will be funded;
- Any assessment has been made of land values and the contributions to infrastructure which will be required to be made by landowners and developers;
- The proportion of landowners with land owned on the proposed site of the new town who have agreed the proposals and are supportive of its phasing. (It is reported that Borough Council staff have been visiting landowners during this consultation but the purpose of the visits, or even whether they have been made, has not been disclosed by the council);
- The funding mechanism to be used to secure comprehensive development in accordance with the Masterplan;
- The Vision Document is useful as a checklist of good practice and a vision of utopia - but does have a number of omissions.

Appendix C

Windfall sites

NPPF¹³ definition of windfall sites: Sites not specifically identified in the development plan.

We welcome the proposed inclusion of an allowance for windfall housing, particularly as no windfall allowance was made in the currently adopted Local Plan 2011-2031. This has resulted in housing permissions and completions well in excess of the plan's proposed numbers (20% over by 2022).

NPPF extract

69. Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should: a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved; b) use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward; **c) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes;**

NPPF extract

71. Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. **Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.** Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.

The Borough Council is very good at monitoring housing commitments, and completions, their sources (for example whether greenfield or brownfield (Previously Developed Land), windfalls and allocations, site size, etc. Each year the Council produces a document entitled 'Land for New Homes - The Housing Monitor'. We agree with the Council's statement that *"It is important*

¹³ 20 Jul 2021 — The **National Planning Policy Framework** was revised on 20 July 2021 and sets out the government's planning policies for England.
<https://www.gov.uk/government/publications/national-planning-policy-framework--2>



*to monitor windfall provision as an assessment of past trends, and to be able to derive some indication as to likely future supply.*¹⁴

Using the percentages quoted in Land for New Homes for each year 2012-2022 it is clear that an average of significantly over 400 dwellings per year were built on windfall sites - and these completions exceeded numbers of homes built on allocated sites.

Conclusion

We consider that the proposed total allowance of only 750 windfall homes for the new plan is unjustifiably low and should be re-considered in the light of meeting NPPF guidance.

¹⁴ **Land for New Homes** 2021 Section 6 Page 21.
<https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Planning%20Policy/Monitoring/Land%20for%20New%20Homes%202021%20FINAL.pdf>



From Land for New Homes. The Housing Monitor.

Published annually by Stafford Borough Council.

SBC data		Our calculation using SBC data	
Year	Completions total	Total for windfalls*	Total for allocations
2022 completions	506 (windfalls 56%)	283	223
2021 completions	620 (windfalls 49%)	303	317
2020 completions	752 (windfalls 53%)	398	354
2019 completions	699 (windfalls 56%)	391	308
2018 completions	863 (windfalls 74%)	638	225
2017 completions	1010 (windfalls 77%)	777	33
2016 completions	863 (windfalls 74%)	505	278
2015 completions	428 (windfalls 90%)	385	43
2014 completions	411 (windfalls 100%)	411	0
2013 completions	306 (windfalls 100%)	306	0
2012 completions	425 (windfalls 100%)	425	0
Total		4822	1981

* Rounded down.

In the period 2012 to 2022 the average rate of windfall completions was 438 per year (4822 divided by 11).

In the same period the average rate of completions on allocated sites has been 165 per year. (1981 divided by 11).

Notes:

It may be argued that these numbers have been 'skewed' by windfall permissions which were granted to extend a number of 'Key Service Villages' - where no allocations were made but a total allowance of 1200 was made in Part 1 of the Adopted Local Plan 2011 to 2031.

However, Part 1 of the plan did not identify village boundaries and Stafford Borough Council granted many permissions on unallocated sites.

Taking 1200 from windfall numbers:

1. As if they had been allocated sites completed in the period 2012 to 2022 and assuming that they had all been built;
2. Transferring 1200 from windfalls to allocations would give a total on allocated sites and Key Service Villages of 3181 (1981+1200) and average completion rates would be 289 p.a.
3. The new 'residual number' of windfalls would be 3622 (4822-1200) and average completion rates would be 329 p.a.

Part 2 of the plan identified village boundaries. Part 2 was adopted some years later than Part 1.



From: Preferred Options Consultation [REDACTED]
Sent: 07 December 2022 15:27
To: Strategic Planning Consultations
Subject: Preferred Options Consultation - Submitted Response

Full name: **Julie Tanner**

Email: [REDACTED]

Statutory Bodies and Stakeholders

Organisation or Company: **Design:Midlands**

Age: **No reply**

Added to database: [REDACTED]

Topics (Contents page): **Design and Infrastructure Policies**

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: **Not asked**

Comments: **Not asked**

Site Allocation Policies

Q4 - Do you agree with the proposed allocations?

Policy 9 (North of Stafford): **Not asked**

Comments: **Not asked**

Policy 10 (West of Stafford): **Not asked**

Comments: **Not asked**

Policy 11 (Stafford Station Gateway): **Not asked**

Comments: **Not asked**

Policy 12 (Other housing and employment land): **Not asked**

Comments: **Not asked**

Site Allocation Policies (continued)

Q5 - Do you agree with the proposed allocations?

Policy 13 (Local Green Space): **Not asked**

Comments: **Not asked**

Policy 14 (Penk and Sow): **Not asked**

Comments: **Not asked**

Policy 15 (Stone Countryside): **Not asked**

Comments: **Not asked**

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: **Not asked**

Comments: Not asked

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forestry development, tourism development and canals. Do you agree? **Not asked**

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Q8 - The local plan proposed a policy (23) on affordable housing. Do you agree? **Not asked**

Comments: **Not asked**

Q9 - The local plan proposes a policy (30) to help meet identified local need for pitches for Gypsies and Travellers. Do you agree? **Not asked**

Comments: **Not asked**

Q10 - The local plan proposes policies around homes for life, rural exception sites, new rural dwellings, replacement dwellings, extension etc. Do you agree? **Not asked**

Comments: **Not asked**

Design and Infrastructure Policies

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

Comments: **Design:Midlands (Company Registration No: 04456338 - Registered Charity : 1143920) is the charitable organisation that manages the independent design review panel for the Midlands. With our knowledge and experience of development in the Stafford area, we will be best placed to support major and sensitive development to ensure it meets the policies in your emerging Local Plan and raises standards in design and sustainability. Design:Midlands in particular will ensure that advice on local distinctiveness is complemented by knowledge of national design policy. We welcome therefore the reference to design:midlands in the accompanying paragraphs that promotes our services.**

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:

No reply

From: Vicki Popplewell (Planning) [REDACTED]
Sent: 12 December 2022 10:18
To: Strategic Planning Consultations
Cc: [REDACTED]
Subject: Stafford Borough Preferred-Options-Consultation-Response-Form final 12-12-22
Attachments: Stafford Borough Preferred-Options-Consultation-Response-Form final 12-12-22.docx

Please find attached a response from Dudley MBC.

If you have any further questions please do not hesitate to contact me.

Regards,

Vicki Popplewell
Planning Policy Manager

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

www.dudley.gov.uk



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Please consider the environment - do you need to print this e-mail?

Contact Details

Full name (required): Vicki Popplewell

Email (required):

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

[Statutory Bodies and Stakeholders](#)

Organisation or Company Name (if applicable): [Dudley Metropolitan Borough Council](#)

Tick the box that is relevant to you:

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

[Prefer not to say / not applicable](#)

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)

NO COMMENT.

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 / No

Policy 1 Comments:

Housing

The policy proposes to provide 10,700 homes (2020-2040) consisting of 8,700 homes to meet local needs and 2,000 homes as a contribution to the wider unmet needs of other local authorities in the region. The 8,700 homes for local needs represent a 'jobs based' figure of 435 dwellings per annum (dpa). This is an economic uplift on the minimum local housing figure of 391dpa (as calculated using the standard method for local housing needs) and has been informed by the latest Economic and Housing Development Needs Assessment (EHDNA, 2020). We note that the EHDNA is due to be updated following the preferred options.

Dudley MBC, as part of the Black Country Local Authorities joint response to the Issues and Options consultation (April 2020) previously supported a higher housing growth requirement (Scenario E) of 12,942 homes (alongside 12,472 jobs and 133ha of employment land). Whilst the preferred option represents a lower level of development than Scenario E, it is an uplift to the minimum local housing needs reflecting economic growth ambitions and unmet housing needs in the region. Given that the growth ambitions for Stafford Borough will rely on net in-migration into the Borough (as natural change is negative due to an ageing population- detailed in pages 25-27 of the SBCs supporting 'Housing and Employment Land Requirement Topic Paper') the relationships with neighbouring housing market areas are crucial.

Policy 1 comments continued...

Whilst we are supportive of the positive approach to addressing wider unmet housing needs, we note that the proposed contribution of 2,000 homes is not yet attributed to any specific local authorities, or housing market areas. Paragraph 1.3 of the supporting text to the policy states that this is subject to ongoing negotiations with other local authorities in the region. Dudley MBC, as part of the Black Country Local Authorities joint response to the Issues and Options consultation (April 2020) previously requested that 1,500 – 2,000 homes be apportioned to unmet housing needs arising from the Black Country. We would therefore welcome further clarification from Stafford Borough Council (SBC) on this matter.

Dudley MBC, as part of the Black Country Local Authorities joint response to the Issues and Options consultation (April 2020) supported a contribution to unmet housing needs in the region of 1,500- 2,000 homes on the assumption that 300 homes could be delivered per annum in a new settlement at Meecebrook between 2030 to 2040. Dudley MBC continues to be supportive of the overall strategy and the proposal to identify a new settlement at Meecebrook.

We note that the supporting 'Housing and Employment Land Requirement Topic Paper' at page 29 considers whether the additional dwellings arising from the economic uplift to the minimum local housing needs requirement (approximately 1,000 dwellings over the plan period) could be used as a contribution towards wider unmet housing needs. We would support SBC in considering this further as part of their evidence base review/updates, including the update of the EHDNA following the preferred options. We consider that the approach could be justified on the basis of the reasoning within the abovementioned topic paper commentary.

Employment

The policy proposes to provide at least 80 hectares (ha) of new employment land. This preferred scenario aligns with the preferred housing requirement. It supports the creation of 8,894 new jobs 2020 to 2040. This is a middle ground between the lower and higher labour demand projections of future employment growth (accommodates 50% more jobs than the Cambridge Econometrics projection for employment growth) which SBC consider to be a positive but realistic growth strategy.

Policy 1 comments continued...

The policy identifies an employment land supply of 156ha. The supporting 'Housing and Employment Requirement Topic Paper' at page 25 states that SBC has doubts about the reliability of the use of labour demand to predict future land requirements in the industrial and warehousing and distribution sectors. The land requirement for these sectors will be reviewed as part of the EHDNA update after the preferred options consultation.

In the meantime, the preferred options propose additional employment land allocations above the 80ha minimum to provide flexibility, insurance against non-implementation of existing permissions, and to respond to market signals of low vacancy and unmet requirements. 30ha of employment land is allocated at Meecebrook to deliver long-term greater self-containment at the new community (15ha within the plan period).

Dudley MBC, as part of the Black Country Local Authorities joint response to the Issues and Options consultation (April 2020) supported Scenario E (potential to deliver 12,942 homes, 12,472 jobs and 133ha of employment land) and requested that between 35 to 40ha of employment land be apportioned to address unmet needs arising from the Black Country.

We note that the employment land requirement is expressed as a minimum, and the policy identifies significantly more supply (156ha) than the minimum 80ha required at this stage. We note that the policy does not reference any contributions to unmet employment land needs arising. We would request that an element of this headroom in employment land supply is made available to meet wider than local needs given the employment land shortfall arising from the Black Country. We would also welcome further information being provided as the update to the EHDNA is progressed (in respect of any updates to the employment land need/supply position).

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

Yes / Ne

Policy 2 Comments:

Dudley MBC, as part of the Black Country Local Authorities joint response to the Issues and Options consultation (April 2020) supported the proposals for Meecebrook to be allocated as a new Garden Community, particularly in the context of this settlement being able to contribute to the unmet housing needs of the Black Country. We continue to support the proposals.

Policy 3. Development in the open countryside - general principles

Yes / No

Policy 3 Comments:

No comment.

Policy 4. Climate change development requirements

Yes / No

Policy 4 Comments:

No comment.

Policy 5. Green Belt

Yes / No

Policy 5 Comments

No comment.

Policy 6. Neighbourhood plans

Yes / No

Policy 6 Comments:

No comment.

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?

Yes / No

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:

As outlined in our responses to Policy 1 and Policy 2, we are supportive of the proposals to develop a new Garden Community at Meecebrook. This is in the context of the development being able to contribute to wider unmet housing needs in the region. Timely delivery of critical infrastructure connections, namely the additional railway station on the West Coast mainline, should be ensured as part of the framework process.

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:

No comment.

Policy 10. West of Stafford

Yes / No

Policy 10 Comments:

No comment.

Policy 11. Stafford Station Gateway

Yes / No

Policy 11 Comments:

No comment.

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:

No comment.

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:

No comment.

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

Yes / No

Policy 14 Comments:

No comment.

Policy 15. Stone Countryside Enhancement Area

Yes / No

Policy 15 Comments:

No comment.

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 / No

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:

No comment.

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:

No comment.

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:

No comment.

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:

No comment.

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:

No comment.

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:

No comment.

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:

No comment.

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:

No comment.

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:

No comment.

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:

See comments in response to Policy 1 regarding matters for further discussion.

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.

We welcome the opportunity for continued joint working and collaboration under the Duty to Cooperate as the Stafford Local Plan progresses.

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.

From: Stacey Worden [REDACTED]
Sent: 09 December 2022 10:14
To: SPP Consultations
Cc: [REDACTED]
Subject: Eccleshall Parish Council response to the Local Plan Consultation
Attachments: EPC Local Plan 2022 Submission 9th Dec 2022.pdf

Hi,

Please find attached the response of Eccleshall Parish Council to the Local Plan consultation.

Kind Regards

Stacey Worden, PSLCC
Clerk to Eccleshall Parish Council
Tel: [REDACTED]

www.eccleshallparishcouncil.co.uk
www.facebook.com/EccleshallPC

[REDACTED]

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Eccleshall Parish Council

Stafford Borough Council Local Plan 2020-2040 Consultation

Eccleshall Parish Council Submission

Circulation

- Stafford Borough Council: [REDACTED]
- [REDACTED]

A. Overview – Meecebrook

Eccleshall Parish Council is of the opinion that the revised plans for Meecebrook are unachievable as presented in the Local Plan Preferred Options document. Substantial revised analysis and evidence needs to be completed for the current option to be proven to be feasible and more favourable than other options. **Eccleshall Parish Council recommends that:**

1. The total number of houses within scope are reduced, eliminating the 2,000 houses from other authority areas owing to lack of current evidence that other authorities are unable to deliver this in their own current provision.
2. The Borough Council focuses on large-scale developments on 'brownfield' already developed sites, including those in the original 7 options as well as others not listed.
3. The Borough Council increases the assumed provision of houses within existing communities and settlement boundaries, with a focus on cleaning up contaminated land in preference to approving construction on the best grade agricultural land as is the case with Meecebrook.
4. Any large-scale development, wherever it is located within the Borough, must have key infrastructure improvements in place before the first house is built, or compensatory schemes in place in nearby communities that are all currently over capacity (including schools, medical services, road, waste water, sustainable transport routes, and employment capacity).
5. Any large-scale development must have adequate soil, minerals, flood, and hazards surveys completed prior to selection as a preferred option, owing to the risk to viability of the Local Plan should these studies be undertaken later in the process and prove the site to be unsuitable.
6. Eccleshall Parish Council has reviewed the consultation submissions of Yarnfield & Cold Meece and Chebsey Parish Councils, and wholeheartedly endorse and support the conclusions of those submissions. The Council particularly wishes to draw attention to the level of detail on the railway station non-viability and the drastically altered character of the area, as well as the lack of local consultation with stakeholders that, if undertaken at the right time, could have helped the Borough avoid the wasted opportunity and money that the Meecebrook project currently represents as presented.

B. Minerals and current land profile:

1. It is noted that the Policy and Proposals Map for the Minerals Local Plan for Staffordshire, published by Staffordshire County Council, lists part of the land as a safeguarded area, and development on this land will sterilise minerals that currently lie underneath Meecebrook. We see no evidence that an impact assessment was completed prior to Meecebrook's selection as a preferred option. This assessment is required. The Local Plan cannot continue at present until this assessment has been completed to the satisfaction of that authority.
2. Some of the land close to the Swynnerton Road is a known radon zone, and we see no assessment of this risk. Meecebrook should not be progressed until this has been completed.
3. Much of the land within the zone is prime agricultural land (grade 2 and 3) with phosphates and other nutrients present. The risk of causing a nutrient imbalance in the Meecebrook and River Sow, both significant (EA) rivers and close to headwaters, needs full evaluation before the Meecebrook site can proceed as a preferred option. Taking prime agricultural land out of food production has an impact on the local food supply, yet the evidence does not contain any analysis of how this can be redressed with Meecebrook as an option. Other options have a lower impact on the food production capacity of the borough, and these sites (Redhills, Hixon) would better meet the current Borough policy in this matter. Potential impact should have been, and needs to be, properly assessed – with comparisons to the other comparable options for development – prior to proceeding with Meecebrook as the preferred option.
4. Adjacent to Hilcote is contaminated land, shown on the Meecebrook plan as suitable for housing. If this land remains in the plan then adjustments are required to establish a perimeter of legal radius from this contaminated land, or works undertaken to decontaminate the land, which would be less desirable for development due to these requirements and decontamination costs. It is noted there are other brownfield sites within the options document (Seighford, Hixon, and others) that are also contaminated and would benefit from clean-up – these would become more viable in comparison without the need to remove prime agricultural land from food production and would be more preferable and more in line with Borough Policy than Meecebrook.
5. Developing 1125 hectares of greenfield site takes the Borough Council further away from its Economic Policy on Agriculture (SP6-ii, SP7-ii, SP7-iii of the current Borough Policies, and proposed Policy 20 of the new Local Plan). We see no balancing plans in the rest of the Local Plan to address this, and Meecebrook should not proceed until this is in place. It must be demonstrated that the impact of Meecebrook is more than compensated for by enhanced agricultural activity elsewhere in the Borough.

C. Railway Station

The Railway Feasibility Report is an inadequate basis to evidence a viable and realistic proposal for delivery of a railway station. Without the railway station the entire Meecebrook proposal becomes unsustainable and undeliverable, and an accurate feasibility study is vital.

Reliance on this puts the Local Plan at great risk and without this station, the Local Plan will not meet housing needs. Other options for housing development are less risky due to reduced dependence on railway access. For example, Hixon and Redhills have direct access to A roads, and are between multiple settlements with employment prospects, reducing journey impact on key road junctions in

comparison with Meecebrook's road access, which is highly dependent on the A34, located several miles from the edge of the site.

Other key points to note include:

1. The station cannot open until at least after HS2a is opened, which is currently forecast for 2033-5. The Local Plan timescales list the station opening in 2026 and there being 133,281 passenger journeys originating in the "Garden Village" by 2030, yet the very first house will be built only in 2031. The combination of unrealistic timescales and predictions, coupled with the restrictions imposed by the delivery timeline of HS2 brings the feasibility of the report into question. Meecebrook is no longer a 'village' but just a "settlement" with a reduced source of passengers. The cost of the station is listed as £102M, yet forecast revenue is only £69M in 60 years. These facts further make the railway feasibility report – only recently published in July 2022 - inadequate and it should be discounted as invalid evidence.
2. Regardless of the inadequate Railway Feasibility Report, there will be no adequate passenger usage for the entire period of the Local Plan to 2040 to justify a new station, and at the same time, unless the station is built by 2031, the Meecebrook Plan does not have adequate road provision for car and other journeys to handle the growing need as Meecebrook grows to 3,000 dwellings by 2040. The Meecebrook option should have addressed these forecasts prior to being selected as a preferred option, and these constraints must be addressed in order for Meecebrook to be considered viable.
3. The locations for the North and Central station options are within government-designated flood risk areas and unsuitable for development. There is no significant parking within the plan for the station, yet it is highly optimistic – if not naïve – to assume that passengers will not park on the residential streets of Meecebrook instead, given the anticipated passenger numbers from the station's catchment area. This must be included in the plan for it to be viable, which detracts from Meecebrook's ability to achieve self-sustained housing, retail, and employment goals.
4. The passenger survey underpinning the station viability is two decades old and invalid given current passenger journey habits. It must be repeated to include new patterns such as working from home, leisure travel to rural locations, and the success factors for rural parkway stations. A vital component of any new station study must include a review of equivalent case studies such as new rural stations on main railways, e.g. Ebbsfleet. This is missing and further proves the railway feasibility report is an inadequate basis for proceeding.
5. Network Rail has acknowledged that they have not been asked to take part in any of these studies and has not performed any feasibility studies at all at this stage. There is no known location where a new railway station has proceeded to National Rail approval on the basis of only 6,000 dwellings within 20 years, without any provision for parkway, interchange, or employment factors present as is the case with Meecebrook. The proposed station does not appear to match national or regional railway strategy, and evidence to show how it does support regional and national strategic goals are required for it to be deemed feasible, viable, or practical. There are no 'pull' factors that would support Meecebrook, and it is therefore an entirely too risky proposal upon which to achieve such a large proportion of the need of the Local Plan.
6. The railway station is therefore not viable based on the evidence provided and requires better evidence for it to proceed as envisaged. The suitability of Meecebrook as a location

for 3,000 houses by 2040 is undermined and too risky to be a preferred option for such a large proportion of the Local Plan's required housing allocation.

D. Other Journey types

The Meecebrook Plan and Local Plan do not contain adequate provision for non-railway journeys. Local roads are at capacity during current peak times, especially at key junctions such as at the A34 at Walton. With 40% of anticipated journeys to Stoke (not viable via railway due to multiple connections required to access employment sites within the city), this would exceed the capacity of northbound roads through Yarnfield, Swynnerton, and the A34. Lanes south through Chebsey and Eccleshall are not suitable for commuting, and employment within the Stafford area is scattered and not a realistic option for public transport. Enhancing the railway bridges to handle eastward commuting would require a full appraisal, not present in the evidence provided, yet employment opportunities westward are minimal. Without these, the Meecebrook site is only possible with a railway station since there is not enough employment on site sufficient for the anticipated population levels. Without the railway station the Local Plan would require strategic transport designations to support the expected travel patterns. The Meecebrook Plan must contain sufficient evidence that private journeys can be accommodated on current or improved roads.

The proposed M6 junction (para 9.2.4 of the SA of the Stafford Borough Local Plan (Interim report Oct 2022) is a mistake, undeliverable, and was ruled out by the Select Committee for HS2 in 2018. The resultant increased traffic on local roads led to Highways England highlighting the junction as a requirement, and its support for Meecebrook was predicated on the junction.

Public transport connections east of Eccleshall are sparse, and those to the west and north of Eccleshall are non-existent and considered economically unviable. Until Meecebrook has developed sufficiently to supply enough passengers, public transport would continue to be unprofitable and require public subsidy. The Meecebrook Plan must contain sufficient evidence that road-based public transport needs have been duly considered.

The Meecebrook Vision contains an aspiration for sustainable transport corridors, and the Local Plan fully supports this vision. However, the only cycleway shown on the map fails to proceed beyond Yarnfield, and there is no provision for cycleways to local communities such as Eccleshall, Stone, or Stafford via Chebsey. The sustainable transport provision beyond the Meecebrook boundary must be a network for it to be effective and must be within the broader Local Plan for it to be realistic.

Policy 46 needs to be adjusted to include details of this – specifically 46.B.3 needs to specifically state connections to the higher-tier communities, and 46.D.C should have a 4th bullet to set a distance per dwelling (with larger developments requiring longer-distance cycling, and smaller number of dwellings to have shorter-distance and walking provision to local community centres). With this provision in place, the Meecebrook Vision becomes integrated with the wider Borough Local Plan policy. Without it, Meecebrook's evidence demonstrates inadequate provision for non-vehicular connections to higher-tier settlements (Stone and Stafford) and designated town centres (including Eccleshall).

Meecebrook's employment land designation, if completed, would vastly increase commercial vehicle journeys within the area, yet no adequate analysis has been conducted on the feasibility of such journeys so far from an M6 junction (14 and 15 are deemed too far by those who have vacated Raleigh Hall, which remains partially under-utilised).

E. Self-contained community

The optimistic aspirations for a self-contained garden community are wholeheartedly welcomed, however the evidence to support this aspiration is completely lacking and entirely hinges on the presence of a railway station, which itself relies on an inadequate railway feasibility study and unrealistic timelines.

The Meecebrook Vision is for a self-contained community, yet the edge of Meecebrook is 700m from Eccleshall, an established community with a vibrant social and economic identity. Without established safe walking connections to Eccleshall this will generate vehicle journeys. Without specific protections for the intervening land there is great risk of settlement coalescence. Regardless of the solution provided, Meecebrook as a location needs to be adequately compared with other site options such as Hixon and Redhills with the risk of coalescence highlighted and appraised.

Meecebrook's development is approximately half located within Chebsey Parish. Chebsey as a village is a designated conservation area and has a risk of settlement coalescence with Meecebrook. The Meecebrook Plan does not sufficiently address this risk. It is noted that other designated options have a negligible risk of settlement coalescence with a conservation area village.

The Meecebrook Vision document recognises that until sufficient development has occurred, nearby existing local infrastructure will bear an increased load, however the Meecebrook Plan does not provide sufficient analysis of this. Appendix 9 of the Preferred Options document states that these evidence documents will be provided only later, under Regulation 19 stage, yet without an appraisal of all the options, the designation of Meecebrook as a preferred option has no evidential basis with regard to how existing infrastructure will cope. With sewage services, GP surgeries, schools and flood capacity all running at or above maximum capacity in the area, Meecebrook would require significant investment prior to housing development starting. This is not the case with Redhills (where extra capacity is already underway), or with Hixon or Gnosall (where multiple options exist to spread increased demand until settlement growth allows settlement infrastructure).

Biodiversity review - Policy 47 seeks to increase biodiversity by 10%, yet Meecebrook will harm this objective since it is now a greenfield project. Key housing development projects in the Borough need to include a greater proportion of brownfield than is available at Meecebrook to meet the target of Policy 47. Hixon has a greater proportion of brownfield sites, and as mentioned before, sites such as Seighford, which require decontamination and other preparatory work, would have a far greater positive impact on the environmental biodiversity than Meecebrook, and are preferable.

F. Housing Numbers

Without the contribution by Meecebrook of 300 houses per year from 2031, the Local Plan is unable to meet the commitments to housing contribution. However, Meecebrook as a site brings significant challenges and assumptions based on inadequate analysis, bringing significant risk to the viability of the Local Plan as a whole. To reduce the risk to the viability of the Local Plan, the options should be re-evaluated and needs met from other sites that have fewer risks and issues, but similar opportunities such as:

- A railway station near Hixon
- Established road and motorway connections near Redhills
- Existing cycleways and multiple catchments for services such as those present at Gnosall and Hixon.

The Parish Council notes that in 2020 the Black Country Authorities supported Stafford's plan to take extra housing needs it could not fulfil within their area. However, since then the Meecebrook capacity within the Plan period to 2040 has drastically reduced to 3,000 and the Black Country Authorities have disbanded as a group, this support is not properly evidenced. For the Stafford Local Plan to proceed with supplying housing to meet the needs of other authorities, the Parish Council would need to see properly evidenced and recent acknowledgement of this from neighbouring authorities, reflecting the new situation (reduced capacity at Meecebrook with no M6 junction). The evidence would also have to acknowledge the risk inherent in the assumption around a new railway station, as without it, Meecebrook is a highly impractical location for Black Country connections, and Redhills would be a far superior location due to the M6 junction.

G. Flooding

Building a large development on land where rainfall runs into recognised flood risk areas such as the River Sow and the Meecebrook requires a comprehensive Topographical Survey. This needs to adequately assess the works required to ensure Meecebrook contributes positively to the requirement that the land is able to manage more water runoff than is current, as per the Borough Sustainability Policy.

Eccleshall's sewage and drainage capacity is inadequate to current needs. The measures required to ensure Meecebrook does not contribute to additional issues must be quantified as part of the economic investment required for a settlement in this location. The Severn-Trent Water drainage survey of Eccleshall (2021-2023) must be completed and remedial works agreed before the true investment requirements for Meecebrook can be evaluated. This caveat needs to be included in the Local Plan to ensure risks to the Meecebrook site viability can be properly evaluated, when compared with other options that have a less complex sewerage and drainage situations, such as Redhills.

H. Summary

The Meecebrook site would have been an improved proposal if the MOD site had been included and the M6 junction allowed. Once these factors were removed from the proposal, the Meecebrook site became an inadequate contributor to the housing requirements, and other options should be re-examined in a favourable light. The designation of Meecebrook as the preferred option is not supported by a robust initial evidence base, and further evidence is lacking and should have been completed before the selection of a preferred option was made.

I. Other Policies

Green Belt: Policy 5 does not recommend additional green belt designations to encircle Stone, Eccleshall, etc. Given the pressure that Meecebrook may bring, and the stated desire to reduce settlement coalescence, we recommend that the Local Plan contain a provision to extend Green Belt to ensure the borough's settlements maintain a rural aspect, minimising ribbon development and undesirable development locations.

Policy 6 (Neighbourhood Plans) - Meecebrook is overriding the stated preferences of the local community as evidenced in the existing settlement boundary for Eccleshall Parish agreed by local referendum. There is no evidence that local opinion has changed, and all three local Parish Councils are objecting to Meecebrook's currently proposed location for a number of valid reasons. Eccleshall

Parish, along with Yarnfield & Cold Meece Parish, has been a key contributor to the delivery of the current Local Plan objectives in excess of the Plan's targets. The resulting load on existing infrastructure should not be further exacerbated by the Meecebrook settlement until such time as the current infrastructure has received the necessary investment to have spare capacity. Since this would require significant public investment prior to any development of Meecebrook starting, this seems unlikely. Almost every other option reviewed would have better infrastructure opportunities.

Policy 10: Stafford Borough Council should adhere to the long-standing policy of not supporting large-scale development west of the M6, and incorporate this into this Local Plan, to preserve the essentially rural and agricultural nature of the western part of the borough. Settlement boundaries can then be used to ensure development is possible and encouraged in desired places.

Policy 12 relies on Policy 7. Since Meecebrook is a risky site upon which to assume large-scale development, Policy 7 needs to be enhanced to be able to handle the uncertainty or the entire Local Plan is at risk from one large development's feasibility. Allocating a proportion of the housing need to allow hamlets and small villages to have natural growth (currently banned under Policy 26) will assist these isolated communities to remain viable and simplify the process of small-scale development in a rural setting. A simple calculation based on number of settlements below tier 5 and an assumption of small-scale proportional growth to 2040 will yield additional housing allocations without impacting local infrastructure.

Policy 17 fails to take account of the changing nature of employment need. For example at Raleigh Hall, existing land set aside for employment is underutilised due to modern transport requirements and inadequate road connections. This policy should recognise and support the need to further develop and enhance existing employment locations as a higher priority than the development of new sites at greenfield locations, including road development and other infrastructure needed for modernisation.

Affordable Housing (Policy 23): How can an isolated greenfield site such as Meecebrook or any other greenfield and rural location carry 40% affordable housing? Greenfield sites lack the connectivity to local services and employment to make this target achievable. This target allocation should be re-thought with regards to Policy 52 (transport) to ensure greenfield developments are required to have transport infrastructure in place and thus make their affordable housing proportions achievable.

Policy 38: Telecommunications infrastructure must be specifically treated as a prerequisite for new development sites alongside other utilities such as electricity, water, and drainage. Policy 38 should be adjusted to make this explicit with regards to full fibre broadband.

Policy 46: New cycling routes and similar should appear in Policy 46 and the Policies Map but is not included.

- Policy 46. 46.A.1, 46.B.c both suggest this but the local Plan needs to have actual areas and routes proposed, in coordination with the Strategic Transport Authority (the County Council).
- 46.C does not include sustainable transport and this seems to be a missed opportunity.
- The Parish Council recommends, given that two major developments are Meecebrook and the Stafford Gateway project, the Local Plan would be improved if it were to designate a sustainable transport corridor between the two locations. This could extend via Yarnfield to

Stone and create a spoke cycleway that would additionally benefit all nearby communities along and near the route.

- If Hixon or Redhills (East and North) undergo development, the same approach could be made to align a radial cycleway to these locations, building on the success of the Isabel route and extending beyond the town boundary.

Parking: Policy 50.C.2 and Policy 53 set objectives for parking and EV provision but there are no details on criteria for best locations, distance to public EV or parking for town centres and residents, nor anything the Parish Council can use to determine a town car park location. This policy should be adjusted to include EV charging provision for urban residents who do not have a driveway and will require publicly-provided overnight charging capability within a reasonable distance to their street. This policy should set out the criteria that would meet the policy's objective.

Policy 52-A needs to reflect that connections are specifically to designated town centres and community infrastructure.

- 52.A.2 should specifically link the size of development to the distance that is required.
- 52.A.3 should make specific reference to public transport connections (e.g. bus stops).
- 52.A.5 and 6 should define 'safe', since in-road cycleways, and unpaved unlit walkways, would not be acceptable provision for new housing developments beyond a certain size.
- 52.A.6 - 'All' is a wide definition and may be unsuitable – for example 'all' could include unsupervised toddlers, but it is unreasonable to make all access safe for all potential users. It would be better to leverage national policy wording to ensure this policy is both reasonable and offers as wide a level of access as is relevant (e.g. removing stiles and inserting gates, as per Staffordshire County Council Policy).

From: [REDACTED]
Sent: 12 December 2022 11:54
To: Strategic Planning
Subject: Environment Agency Response to: UT/2006/000313/CS-16/PO1-L01
Attachments: PlanningProposal.rtf

The Local Development Document has been reviewed and I enclose the Environment Agency's comments on:
Core Strategy
Stafford Borough Council
Core Strategy

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[REDACTED]
Stafford Borough Council
Civic Centre
Riverside
Stafford
Staffordshire
ST16 3AQ

Our ref: UT/2006/000313/CS-
16/PO1-L01
Your ref:
Date: 12 December 2022

Dear [REDACTED]

Stafford Borough Local Plan 2020-2040

Preferred Options consultation

Thank you for referring the above consultation which was received on 19 October 2022.

We understand the above consultation is underpinned by an evidence base including a Level 1 Strategic Flood Risk Assessment (SFRA) and a Scoping Water Cycle Study, both of which were produced for the previous Issues and Options consultation in 2020. This is insufficient evidence to support these proposals through examination, and as such additional evidence will be required to be submitted to demonstrate this plan is sound. Further details are provided throughout this letter. At present, it is unclear whether these proposals are deliverable and conflict with some NPPF policies.

POLICY 4. Climate change development requirements

We welcome the requirement for new development to be limited to a maximum of 110 litres per person per day, in line with the observations in paragraph 4.7 regarding this area's classification as a 'seriously water stressed area'. It should be highlighted however, that this requirement is a minimum only and developments that choose to go beyond this should be supported by the plan. Further limiting water consumption and encouraging re-use would provide additional benefits in relation to managing the pressures of climate change. This should be explored further in a Detailed Water Cycle Study.

POLICIES 7 & 8. Meecebrook Allocation and Masterplanning

This site has a number of environmental constraints and opportunities that have yet to be explored within the strategic planning process. These comprise flood risk, water resource availability, water quality and WFD compliance. It is yet unclear whether this site is able to be delivered without a detrimental impact on the environment. We

Environment Agency
[REDACTED]

www.gov.uk/environment-agency

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understand that the detailed masterplanning of this site will be carried out next year in support of an SPD, and we would welcome the opportunity to feed into this process. However, additional evidence on the water environment will be required prior to this masterplanning exercise to inform the choices made, and to inform the specifics of your policies brought forward through the Publication draft of this plan.

Flood Risk

The proposed location for this new settlement sits astride medium and high risk Flood Zones 2 and 3 of the Yarnfield Brook and Meece Brook. We welcome the indicative concept layouts which show the floodplains contained within large areas of public open space through the centre of the site, however the current Level 1 SFRA is insufficient to inform on the detail of flood risk at this location, so additional work will be required to assess and propose mitigation within the Meecebrook scheme, in addition to providing the evidence behind the required Sequential and Exception Tests required by national policy for development in such locations.

The proposed new settlement's location is upstream of Stafford town which already suffers serious flooding problems so as well as ensuring flood risk does not have a detrimental impact on the settlement itself, options should be explored for opportunities to reduce flooding downstream. Discussions should include all partners with a responsibility for flooding including the Environment Agency, Staffordshire County Council (the LLFA) and the Internal Drainage Board.

It is anticipated that significant limitations on surface water discharge rates from the new development areas may be required, which could require significant space for surface water balancing ponds. A significant surface water flow route is indicated on Environment Agency's surface water mapping associated with the chain of lakes in the grounds of Baden Hall. This may need to be considered in more detail and may need to be modelled to prevent flood risk to the new development areas. The LLFA should advise further on this matter.

Your Level 2 SFRA should consider the in-combination effects of various sources of flooding on this site and demonstrate these can be managed in an integrated way, and may also need to consider other water issues at play on this site, as detailed below.

Water Resource and Availability

This development falls within the Staffordshire Trent Valley Abstraction Licensing Area. This catchment abstraction licensing strategy (ALS) sets out how we will manage water resources in the Staffordshire Trent Valley catchment. It provides information on how existing abstraction is regulated and whether water is available for further abstraction. The strategy also details how it protects our statutory objectives under the Water Framework Directive to ensure that deterioration of the water environment does not occur. The Staffordshire Trent Valley ALS is available publicly from the Government's Website.

For groundwater resource management purposes principal aquifers are sub-divided into Groundwater Management Units (GWMU's). All of the GWMU's within the Staffordshire Trent Valley CAMS Area are already over-abstracted, the current level of abstraction is assessed as being unsustainable or over-licensed, the unused licensed headroom if utilised would be unsustainable. Therefore, they are assigned the status of "No Water Available" or "Restricted Water Available".

Compliance with the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 is assessed on a larger Groundwater Body Scale (GWB), often comprising the whole aquifer outcrop. Usually a GWB will contain several smaller

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GWMU's. The quantitative status of the Principal GWB's within the Staffordshire Trent Valley CAMS area are assessed as "Poor" and "At Risk" of further deterioration or "Good" but "At Risk" of deterioration.

Water availability is very limited at this location. This means that no new consumptive licences or licence variations will be issued. In addition, due to our statutory obligations under the Water Environment Regulations to prevent deterioration the Water Company has limited options to increase abstraction over an agreed baseline in this area and must clearly demonstrate that deterioration would not occur if they were to do so. This obligation is detailed in our objectives and measures to address unsustainable abstraction in the Staffordshire Trent Valley ALS document.

The Water Supply Companies have a statutory requirement to prepare and maintain a Water Resources Management Plan (WRMP) usually updated every 5 years and which must forecast supply and demand over at least the statutory minimum period of 25 years. A WRMP sets out how they intend to achieve a secure supply of water for their customers and a protected and enhanced environment, including Water Framework Directive obligations. If a Water Supply Company forecast a deficit they should consider:

- supply-side options to increase the amount of water available to you
- demand-side options which reduce the amount of water your customers require

It is likely through this process the Water Supply Company will identify options to meet the future demand of Meecebrook, however close discussions should be undertaken with Severn Trent Water and fed into your evidence base to detail the scope of the options being considered to meet the demand arising from this development. Additional evidence will be required to show that this proposal is achievable and will not have a detrimental impact of the water environment at this location. This should feed into a detailed Water Cycle Study.

Water Quality and Foul Drainage

This site is traversed by the WFD waterbody 'Meece Brook from Chatcull Brook to R Sow' (GB104028053010) which is defined by the Humber River Basin Management Plan as being of Poor Overall status, with flow conditions not supporting Good Status.

Nearby sewage treatment works Pirehill, Eccleshall and Brancote do not appear to have headroom to accommodate the proposed additional flows, and Strongford works, although bigger is some distance from the site and may not be a sustainable option in terms of pumping that distance.

If a new treatment facility was proposed to treat foul wasters arising from this new settlement it would need to comply with the no deterioration policy for WFD and not undermine improvement works completed at the upstream locations. This could result in some very tight permit limits, possibly beyond current technological limitations.

It is therefore unclear what solutions are proposed and if there are indeed solutions available to provide foul drainage infrastructure for this new settlement. Close discussions with Severn Trent Water should be facilitated to ensure there is a solution available. It is imperative that further evidence is produced to examine this and demonstrate that the proposed scheme is viable. Failure to provide this could risk the plan being found unsound.

Contaminated Land

The proposed site is situated on the bedrock of the Mercia Mudstone Formation. This is designated as a Secondary B Aquifer by the Environment Agency. Secondary B Aquifers are predominantly lower permeability layers which may store and yield limited amounts of groundwater due to localised features such as fissures, thin permeable horizons and weathering. Superficial deposits are present in the form of Alluvium deposits over part of the site, designated as a Secondary A Aquifer. Secondary A Aquifers are permeable layers capable of supporting water supplies at a local rather than strategic scale, and in some cases forming an important source of base flow to rivers. These deposits are likely to be in hydraulic connectivity with the Meece Brook, which flows through part of the site. The site is located close to, but just outside of a groundwater Source Protection Zone. A public water supply borehole is located in proximity to the north-western site boundary. The site can therefore be considered to be reasonably sensitive with respect to groundwater resources and its potential for contamination.

Available information identifies that part of the site has formerly been occupied as a munitions factory and testing centre by the MOD. An historic landfill is located within the proposed site boundary, known as 'Royal Ordnance Factory', and is identified to have accepted a range of wastes. The northern boundary of the site is also adjacent to an authorised landfill at Cold Meece. All of these historic uses of the site, as well as the current adjacent use of the site, represent a significant risk of contamination that could be currently impacted controlled waters at this location. Furthermore, there is a risk of mobilising existing contamination during re-development and this should be fully addressed during redevelopment in addition to being considered as part of any drainage proposals.

POLICY 9. North of Stafford

Point D asks for a comprehensive drainage scheme to alleviate flooding in Sandyford Brook catchment. A potential scheme is currently under discussion however this needs to be resolved before the largest part of the site can be developed.

POLICY 11. Stafford Station Gateway

As with the Meecebrook allocation, this site is significantly affected by Flood Zones 2 and 3 and is only supported by a Level 1 SFRA. This is insufficient to demonstrate that flooding can be managed on site, will not increase risk to third parties and passes both the Sequential and Exception Test in line with national planning policy. In light of this a Level 2 SFRA will be required.

We have recently provided comment on the draft SPD for this allocation, a copy of these comments is included within Appendix A. these comments should also be considered when looking at the overarching policies for this allocation.

We note within this SPD it states that hydraulic flood modelling has been undertaken, and this shows flooding does not affect the site. The Environment Agency has not however been party to this modelling, and cannot comment on the model's validity. We recommend that any such modelling is submitted to the Environment Agency for review and approval and/or included within a Level 2 SFRA.

Please note: the Environment Agency is updating our flood modelling of the Sow and Penk in early 2023 and this may affect the understanding of flooding along the Ordinary Watercourses at this location. It may be pertinent to consider this new information in any forthcoming assessment or proposals for the area.

The proposed site is situated on the bedrock of the Mercia Mudstone Formation. This is designated as a Secondary B Aquifer by the Environment Agency. Superficial deposits are present in the form of Alluvium deposits over the site, designated as a Secondary A Aquifer. These deposits are likely to be in hydraulic connectivity with the River Sow, and surface water drainage channels, which flow in proximity to the site. There are historic landfills noted within this area of the Borough, which may represent a risk of contamination that could be mobilised during redevelopment to pollute controlled waters. It is therefore essential that contaminated land remediation is considered as an essential and integral part of this redevelopment scheme.

Due to the fact the watercourses on site are Ordinary Watercourses any consenting for works along these channels will be led by the LLFA. Due to its close connections with Doxey Marshes SSSI discussion should also be held with the IDB and Natural England due to the potential impacts in the wider catchment.

POLICY 13. Local green space

Some of the identified areas proposed to be allocated as green space are affected by watercourses and floodplain. Section D of this policy states that the areas will be protected from development, however some small structures ancillary to the primary use of the land may be permitted. The Environment Agency would look for continued access to the river channels in order to carry out permissive duties in relation to flood maintenance, and it should be ensured Main River easements (minimum 8m) will be maintained as a result of these designations and that any opportunity to daylight and renaturalise culverted watercourses are taken.

It therefore may be pertinent to consider the constraints and opportunities of the following sites in further detail prior to allocation and/or discuss with the LLFA where there may be surface water flood issues.

- Playing field at Doxey. Flood Zone 2.
- Play area at Melbourne Crescent. Kingston Brook Main River. FZ2 and 3.
- St George's Mansions Sandyford Brook Main River around site. Minor SW flooding.
- Football Ground at Doxey is in Flood Zone 2.
- Land at Uttoxeter Road, Stone. SW flow route through site.
- Saxifrage Drive, Stone. Aston Lodge Main River through site. FZ 2 and 3.
- Land adjacent to The Croft, Woodseaves. Ordinary watercourse culverted under site.
- Land in centre of Adbaston. SW flow route.
- Land in the centre of Yarnfield. Yarnfield Brook Main River passes through site. Flood Zones 2 and 3 on site.

Of particular note is Land South of Stafford Common. The Sandyford Brook is culverted beneath site and surface water flooding is shown to affect this land. There is potential for this land to be used as a flood attenuation pond to reduce flooding at Sandon Road. This could be considered further as part of the Level 2 SFRA.

Policy 14 Sow and Penk Enhancement.

Policy 15 Stone Countryside enhancement area.

We welcome the inclusion of these two enhancement areas which are both significantly influenced by the riverine environment. We would welcome the opportunity to feed into the masterplanning process of these two areas to discuss the implications of floodplain management and water-based ecology.

POLICY 37. Infrastructure to support new development

We welcome the inclusion of this policy which includes flood and river infrastructure and states that pre-commencement conditions will be used to secure funding.

Commuted payments suggests that the Council will maintain the infrastructure. In the case of Drainage Infrastructure, Water Companies should take these infrastructure items on, according to the latest Sewerage Sector Guidance. Further discussion with Severn Trent Water is advised.

POLICY 42. Flood risk

Although this policy supports the drive of national policy it does not feel as if it is particularly distinctive to its location and associated flood characteristics. We would look towards a Level 2 SFRA to provide greater detail and a local slant on how national policy should be applied at this location, and the specific needs and opportunities presented by this locality.

We draw your attention towards the recently updated NPPG in relation to flood risk matters and would look for these changes to be reflected within a Level 2 SFRA and this associated policy as appropriate.

Paragraph 42.5 draws a link between climate change and natural flood risk management (NFM), something which has now been given greater focus as part of the NPPG update. We welcome the statement this will be encouraged, and this could be something to be included within the body of the policy dependant on the recommendations of the Level 2 SFRA.

Since your Level 1 SFRA was published government guidance on climate change allowances for planning when considering peak river flows have been updated and are now specific to catchment. The allowances for the Trent Valley Staffordshire Management Catchment are applicable in your area and should be applied going forward in both strategic matters and for individual proposals.

Paragraph 42.4 links to national guidance on when a flood risk assessment is required for planning applications. It should be noted this year we (the Environment Agency's West Midlands area) have rolled out our own local standing advice which has differences to the national package indicated in the hyperlink.

POLICY 43. Sustainable drainage

Again we draw attention to the updated NPPG in relation to drainage matters, with a particular note on how they should be considered in conjunction with other sources of flooding. This policy should be built upon following the publication of additional evidence base documents, including the Level 2 SFRA as well as the Water Cycle Study which could provide further links to water quality and potential pollution issues to be considered.

The Environment Agency would look for a commitment for clean roof runoff to be directed away from the sewer system and into infiltration drainage or other SuDS system in order to reduce pressure on the sewer system and reduce instances of combined sewer overflows and associated pollution problems.

Policy 46. Green and Blue infrastructure

We welcome the contents of this policy but recommend that additional points are added address the need for de-culverting and maintenance access. There should also be

something in here explaining the Main River network and the roles of EA, LLFA and IDB in granting permission for works.

Deculverting or daylighting of watercourses should have a policy here under 'Improved access to blue infrastructure' for the benefit of flooding, public access, biodiversity and fish passage.

NFM could also be further explored in this policy in conjunction with Policy 42.

POLICY 50. Pollution

The following comments on the principles of controlled waters protection apply to all preferred options within the local plan.

Land contamination can adversely affect or restrict the beneficial use of land. Often development presents the best opportunity to successfully deal with these risks. We would recommend that the redevelopment of this area encourages the use of sustainable and effective remedial measures to prevent or address water pollution from sites affected by contamination. This includes the recycling of water and soils where appropriate. However, these operations must not result in an unacceptable release to groundwater and must where necessary have appropriate permits and controls.

The potential for contamination and any risks arising from development activities should be properly assessed and the development must incorporate any necessary remediation and subsequent management measures to deal with unacceptable risks, including those covered by Part IIA of the Environmental Protection Act (EPA) 1990. Intending developers should be able to assure the Local Planning Authority that they have the expertise, or access to it, to make such assessments. Management of Contaminated Land by application of the well-established principles and practices will help both the Local Authorities and the Environment Agency deliver its obligations by virtue of the Water Framework Directive.

Reference and gravity should be given to National Planning Policy Framework (NPPF) paragraphs 174, 183 and 184. Overall, developers should demonstrate the following:

- assessment of landfill gas risk;
- assessment of contamination where suspected;
- prioritization of brownfield/contaminated sites to bring back into use;
- encourage the use of SuDS, provided that they are appropriate for their location, suitable management and maintenance measures can be put in place, as they can also be of benefit for nature conservation;
- encourage pre-application discussions with the Local Planning Authority, relevant pollution control authority and stakeholders with a legitimate interest (i.e. drainage and Lead Local Flood Authority);
- Preliminary Risk Assessment (PRA) to be undertaken as a first stage of assessment of risk and be a requirement for validating planning applications;
- all investigations to be carried out in accordance with CLR11 (which requires a risk based approach and remediation options appraisal) and the council's Supplementary Planning Document, SPD, if it were to be produced;
- assessment of potential impact to natural water resources from dewatering activities during development works;
- minimizing the use of landfill and encouraging re-use of waste, where appropriate.

We would welcome reference to these matters within the supporting text of this and other linked policies as appropriate.

POLICY 12. Other housing and employment land allocations

We have additional comments to make in relation to certain sites, which will follow in due course.

We would welcome the opportunity to further engage with your authority on the matters raised above, and in expanding the evidence base for the water environment which may fall within the scope of our Cost Recoverable Planning Advice Service. Please contact me on the details below for further queries.

Yours sincerely

Ms Jane Field
Planning Specialist



[REDACTED]
Stafford Borough Council
Civic Centre
Riverside
Stafford
Staffordshire
ST16 3AQ

Our ref: UT/2006/000313/CS-
16/PO1-L02
Your ref:
Date: 12 December 2022

Dear [REDACTED]

Stafford Borough Local Plan 2020-2040

Preferred Options consultation

I write with additional details on site allocations proposed within this plan. This letter should be read in conjunction with our previous response UT/2006/000313/CS-16/PO1-L01 which includes full details of our position in relation to the Preferred Options Policies and supporting evidence base.

POLICY 12. Other housing and employment land allocations

We welcome the revision of site allocation boundaries to reflect the mapped floodplain, and to ensure site allocations fall wholly within low risk Flood Zone 1.

Despite this, concerns remain with regards to a couple of sites, and additional assessment is advised to fully and accurately assess the risk of flooding at these locations.

We recommend that **Stafford Land at Ashflats (STAFMB03)** is included within the Level 2 SFRA (alongside Stafford Station Gateway and Meecebrook) for further assessment. The flood mapping we hold in this location is of a high level and coarse nature which is not intended to provide a detailed assessment of risk in relation to specific sites. Coupled with this, our surface water flood maps show a surface water flow route crossing the site that looks to take up a significant proportion of the land. Where we do not have high confidence in the detail of our flood mapping we may look to other sources of information to corroborate our flood zones or show where it may be inaccurate. In this instance, surface water mapping appears to indicate an area of flow lying land connected to the floodplain that our broadbrush flood modelling has not picked up. given that this appears to affect a quarter of the site, we recommend it is

Environment Agency
[REDACTED]

www.gov.uk/environment-agency

Cont/d..

looked into in more detail prior to allocation as it has the potential to impact the capacity of this site in terms of numbers of dwellings it can accommodate.

The boundary of **Land East of Oakleigh Court (STO13)** is also informed by lower confidence flood risk mapping for the Main River flowing along the southern boundary, with a second Ordinary Watercourse running along the northern boundary of the site which has not been assessed as part of our national mapping exercise. The risk from this watercourse is completely unknown. Both watercourses flow into culverts as they leave the site on the western boundary, and this is not reflected within the high level floodmapping. Surface water mapping appears to reflect the JFLOW modelling, however this also only reflects the topography and not the presence of culverts. We are aware of development proposals on land to the immediate west, which was supported by flood modelling and culvert assessment. Given the potentially high public interest of this site's allocation it may be prudent to include it within the Level 2 SFRA assessment, with consideration of using or revising the assessment already undertaken in support of 17/25759/OUT. In the absence of this, a FRA should be specified as a requirement of the site's allocation.

SCC Depot, Newcastle Road (STO05) and **Land at Trent Road (STO08 and STO10)** are also affected by the lower confidence JFLOW flood mapping, however a quick review of other sources of data do not appear to contradict the floodplain mapping at this location. In light of this, although we consider additional assessment should be undertaken, we do not consider it necessary to undertake this prior to allocation, and instead recommend a FRA to consider fluvial flooding is undertaken in support of the planning application when the time comes. This should be listed as a requirement of the allocation.

Land to rear of Woodseaves School (HIG13) is located directly on top of land shown to be permitted by the Environment Agency under the Environmental Permitting Regulations. We have on record permit number, [REDACTED] issued to [REDACTED]. The site is permitted for 'non-biodegradable waste'. The status of the site is non-operational, but the permit is still in force. The permit should be surrendered prior to any redevelopment.

It is unknown however, what would be required as part of the application to surrender the permit, and how long this may take. This may restrict development at this location or render it unviable.

Prior to any redevelopment, gas and leachate risks must be determined by way of gas and hydrogeological risk assessments in relation to nearby sensitive receptors, including the effect of the development itself upon the landfill site in relation to gas and leachate behaviour. The risk assessments should inform the necessary control measures required to protect the environment and human health as part of any redevelopment. Without this, we cannot comment on if redevelopment should take place or not.

In light of the above, redrawing the site's boundary to eliminate this parcel of land may not resolve the issues at play as it is currently unknown what the risks are from the waste operations that have taken place. Without further evidence, assessment or discussions between the site operator and the Environment Agency regarding permit surrender and the process involved, we recommend this site is withdrawn from the site allocation process.

Should you wish to request further environmental information from us in relation to the permit in place and the ongoing regulation of this site, this request can be made formally by contacting [REDACTED]

We hope the above comments are of use in your consideration of these sites. Should you wish to discuss these matters with us this may fall within the scope of our Cost Recoverable Planning Advice Service, please contact me on the details below for further information or a quote.

Yours sincerely

Ms Jane Field
Planning Specialist

[REDACTED]

From: Aaron Bibby [REDACTED]
Sent: 22 November 2022 19:05
To: Strategic Planning
Subject: Local Plan

To whom it may concern,

I am aware that you are currently reviewing your local plan and have released a draft version for consultation. Having read through the document, I am shocked to discover that, once again, there is no mention of social care facilities such as Children's Residential Homes, Semi-Independent Facilities or Residential Family Assessment Centres.

According to the Office for National Statistics, Staffordshire County Council have one of the largest Looked After Child (LAC) populations in the country, which has continuously grown for the past 5 years; on average, the LAC population has increased by an average of 51 young people per year. However, despite the growing need for more provision to accommodate and support what are some of the most vulnerable members of our society, the local plan excludes any mention around the development of social care provision.

While I appreciate that producing a plan that encompasses and includes every single demographic within our society is unrealistic, I feel excluding these crucial social services from the local plan is negligent as there is a clear shortage of suitable accommodation available. Having experience in the opening of these services, I'm also acutely aware of the difficulties providers of these services have in obtaining planning permission which, in my experience, is primarily caused by the lack of a clear policy and guidance.

While reading the local plan, I did notice many vulnerable demographics are clearly identified and strategies to accommodate their needs are included; such as suitable homes for the elderly. Therefore, I see no reason why the LAC population, and social care services in general, shouldn't be highlighted within the local planning policy.

With this in mind, I would like to politely request that the local plan be reviewed to reflect and include the development of the specialist services that are currently being overlooked.

Kind Regards
Aaron Bibby



Aaron Bibby
Business Development Director



Mobile: [REDACTED]
Email: [REDACTED]
Web: www.firstbluehealthcare.co.uk

From: [REDACTED]
Sent: 12 December 2022 09:51
To: Strategic Planning Consultations
Subject: FW: Gnosall Parish Council's response to Preferred Options document
Attachments: Gnosall PC Preferred Options Response.docx

From: [REDACTED]
Sent: 12 December 2022 09:45
To: [REDACTED]
Cc: [REDACTED]
Subject: Gnosall Parish Council's response to Preferred Options document

Good morning [REDACTED]

Please find attached Gnosall Parish Council's response to the Preferred Options document

Kind regards

Jayne

Jayne Cooper
Clerk Gnosall Parish Council

Tel: [REDACTED]
www.gnosallparishcouncil.org.uk

[REDACTED]



GNOSALL PARISH COUNCIL

(Including the Wards of Moreton and Knightley)

Clerk of the Council:

Miss J. Cooper



Tel/Fax: [REDACTED]

Email: [REDACTED]

Website:

www.gnosallparishcouncil.org.uk

December 8th 2022

Dear [REDACTED]

The Planning Committee has studied the Preferred Options document closely and also took the opportunity to ask questions at the presentation recently held in The Grosvenor Centre. This is the formal response of Gnosall Parish Council to the Draft proposals.

Change to Gnosall Settlement Boundary

This proposed change, to include Land off the A518 previously the subject of an Appeal in 2014 under the number 13/19587/OUT, has caused very great dismay. Gnosall was, as you are aware, the first village in Staffordshire to bring forward its Neighbourhood Plan. It did so because once the designation Residential Development Boundary was removed and before the new Settlement Boundary was established, the village fell prey to speculative developers on all sides and a great many houses were built. Following the advice of David Cameron that a Neighbourhood Plan was the best protection that a community could have against developments imposed against their wishes, we set to and brought our Neighbourhood Plan into being – at a considerable cost in both time and money.

The Council would remind you that in order to be considered acceptable, the Plan had to undergo stringent investigation, in this case by Inspector McGurk. He said of it:

- *There is evidence to demonstrate that the Neighbourhood Plan reflects the views of local people. I am satisfied that the consultation process was significant and robust*
- *I find that, by providing for one-fifth of the 1,200 dwellings for the twelve KSVs, the Neighbourhood Plan can be considered, to some significant degree, to be compensating for less development in other Key Service Villages (KSVs)*

These and other comments by the Inspector show that this was a carefully considered, outward-looking Neighbourhood Plan, embracing the fact that Gnosall's size and location enabled it to compensate for smaller Key Service Villages which were less-able to take their numerical share of planned housing. It was (and is) fully-compliant with National Policy. It received the overwhelming support of the community with a 25% turnout (at that time a very good percentage indeed) and over 90% of voters endorsed it, so it was almost double the required majority.

The Council considers it to be totally unacceptable that your Preferred Options proposal puts forward Gnosall as the only village to have its Settlement Boundary changed. It seems quite undemocratic that Council was required to hold a referendum to establish the Boundary yet the Borough Council has no mandate to change it; such a decision makes nonsense of the entire Neighbourhood Planning process. We would be grateful if you would make us aware of the legal process by which you think it acceptable to do such a thing.

Once "breached" in this way, Council feels that the entire Plan will fall and this will provide the loophole for developers to claim that Gnosall has no operative Neighbourhood Plan and therefore applications will come

forward on all sides. It is highly likely that the Knightley Way/Shelmore land will be one of these, Audmore Loop probably another and who knows what else to follow? It is more than disappointing that the Local Authority, with whom Gnosall Parish Council has always striven to work co-operatively, could propose something with such far-reaching consequences, in order to impose yet more development upon a village which was recognised at the outset to have gone above and beyond its obligations in compensating for other villages' shortfall.

Proposal to site c100 houses on land off the A518.

As has been referred to above, this land lies outside the Gnosall Settlement Boundary and thus should not be proposed for housing, despite its being offered by the County Council – who will no doubt be keen to offer the adjoining two farms in the fulness of time.

This land was first offered under 13/19587/OUT which proposed 150 homes, while the current proposal is for 100 but we have had the Osborne Park development of 68 homes in the interim, so it is of even greater impact. The Borough Council opposed it very strongly, going to Appeal and utilising the services of many experts and a QC, at considerable cost to the taxpayers. At that time the Borough Council claimed that the application was intrusive, out of scale with the village and detrimental to the character of the rural area. None of this has changed yet your position is reversed? This is inconsistent and illogical.

The Council recognises that the Borough Council may still have to meet targets in light of recent Government changes but that does not explain why a village which has had considerable development should have even more, while other villages have had little or none. Woodseaves is a case in point. Although listed for 100+ in the current proposal, brownfield land has been offered there for almost 10 years and nothing has been built as yet, though more land remains on offer. This is patently unfair, especially since Gnosall has a Neighbourhood Plan and Woodseaves does not. Neither does it explain why you propose invalidating our Neighbourhood Plan protection and leaving us open to yet more uncontrolled development instead of a plan-led system which we have always championed and supported. Interestingly, there are places that have had no development to date and actually want some. Norbury, for example, discussed the Settlement Boundary drawn up by yourselves (with which they have some issues regarding accuracy) and would like it made larger so that new homes and younger families (often young people who have been raised in the village) could bring new life to a village that has been static for too long. Consultation at an earlier stage might have shown this to be the case elsewhere too, instead of simply relying on the larger villages to accept yet more development despite their history.

Infrastructure

Despite the significant development Gnosall has had already, it has had no improved infrastructure. The sewerage and waste water system is still inadequate, the surrounding polytunnels have an impact upon drainage and consequent flooding, the floodplain at The Acres demonstrates only too clearly the impact of continued development, climate change and lack of improvement in infrastructure. The Boardwalk has now been raised a number of times and it is underwater again at the time of writing.

It is always said that transport links in and out of the village are good and therefore the site is suitable for development and certainly, East to West travel is direct and serviced by public transport by means of the A518, although it is showing its age and there are issues and blackspots. But North -South is a very different matter and necessitates travel down narrow lanes not serviced by public transport at all. Therefore it is assumed that any development anticipates that residents will travel out to Stafford/Stoke, Newport/Telford for work, leisure and retail and this was confirmed by comments at your presentation. But with the cost of fuel as it is and the cost of living crisis leading to many families having to give up or restrict the use of their family car, how can this be considered sustainable?

Infrastructure includes adequate public services and here too Gnosall is disadvantaged. The main issue is the lack of capacity at the primary school, which was rebuilt in a DFEE/CC scheme on a smaller footprint and with smaller rooms. Council understands that it is currently at capacity, with no possibility of it becoming larger as far as one can see. Even if mobile classrooms were provided, the Main Hall which serves as Sport Hall and Dining Room would not be any bigger and corridors and rooms would still be tight. This is a major concern already, with many families driving their children to smaller villages and smaller schools already and they too are nearing or at capacity. The Council questions how practical it is for parents to be driving children to primary schools, older

children to secondary schools outside Gnosall (and the school bus service has been in the news for weeks for its inadequacy) and then getting to work themselves?

Regrettably, since school capacity is finite, any new development on the proposed site will necessitate the catchment area being drawn closer and closer to the school, which in turn means that new residents may be able to obtain a place at the expense of long-time residents living farther away. This will also impact upon the sibling allocation scheme which has previously kept families together.

Elsewhere in your Preferred Options document, other sites are referred to as not yet ready to bring forward pending the answer to questions of educational capacity. The Council thinks that the same question applies in Gnosall.

Education is not the only public service under pressure. Gnosall's GP Surgery serves everything along the A518 from Shropshire to the motorway bridge and also other settlements within the parish, not just the village, of Gnosall. This is often not recognised. Like other surgeries nationwide, it is under pressure due to staff shortages. There is no proposal to ameliorate this in any way insofar as Council is aware? Furthermore, the closure of the Stafford Hospital site as a full-service hospital, since which time thousands more homes have been built, puts all residents in the Borough at risk and having to travel considerable distances for maternity, paediatric or Accident & Emergency care. There is no nearby Minor Injuries Unit to ease the burden.

Gnosall Parish Council supports the creation of the garden village at Meecebrook, and similar developments. Despite the fact that they undoubtedly use greenfield agricultural land, they are at least adequately provisioned from the outset and this must be better for the ultimate residents of such locations and for existing residents whose services are under strain. However, it very much regrets that the MoD brownfield land, which was to have been central to this proposal, was withdrawn.

Council does feel that there is yet more brownfield land which has not been utilised and would welcome seeing a plan of such sites. For example, the former DWP building near to The Range has stood empty for many many years and become a total eyesore yet councillors feel certain it was a public building and therefore easily re-purposed. There is much unused property, formerly retail, in the north of Stafford town (Marks and Spencer, Co-Op department store) which is not in the ownership of the Borough Council. However, compulsory purchase powers exist and would enable this end of town to become more vibrant, with a blend of retail and housing suitable for younger people and this would reduce the use of greenfield and agricultural land while helping to fulfil the housing quota.


Council is mindful that efforts have been made to bring forward sites for renewable energy resources and the solar farm proposed at Moreton is one such. This can exist in harmony with agriculture, as sheep may graze below the panels, so this is a use which it can support. However, Council questions whether the Settlement Boundaries proposed for the Tier 5 settlements have been drawn up in consultation with communities, as they should have been.

Overall, Council's most stringent criticism is that the Local Authority have proposed that only Gnosall should have its settlement boundary changed, without regard for all that this would entail. It is Council's view that this is wrong in principle and that the Settlement Boundary should be sacrosanct.

Yours sincerely

Jayne Cooper

Jayne Cooper
Clerk Gnosall Parish Council



From: [REDACTED]
Sent: 09 December 2022 15:37
To: Strategic Planning Consultations
Subject: FW: High Offley Parish Council's Response to the Local Plan Preferred Options Consultation.
Attachments: HOPC Local Plan Preferred Options Response.pdf

From: Clerk High Offley [REDACTED]
Sent: 09 December 2022 15:35
To: [REDACTED]
Cc: Strategic Planning <StrategicPlanning@staffordbc.gov.uk>
Subject: High Offley Parish Council's Response to the Local Plan Preferred Options Consultation.

Good Afternoon, [REDACTED]

HOPC met yesterday evening and the agreed response to the Preferred Options Consolation is attached.

All the best.

Stu Ridgewell
Clerk to High Offley Parish Council



Clerk to High Offley Parish Council

Friday 9th December 2022

Strategic Planning, Stafford Borough Council

Response to the Local Plan 2020-2040 Preferred Options Consultation.

Dear [REDACTED]

Having held a public meeting on Thursday 24th November 2022 with its parishioners, High Offley Parish Council (HOPC) submit the following, which reflects both the collective views of parishioners and those of HOPC:

- i. The large development north of Woodseaves C of E Academy and Dicky's Lane, Woodseaves (HIG 13) is disproportionate to, and incongruous with, the character of Woodseaves. Accordingly, HOPC is opposed to the use of this site for housing development. Please also note, in relation to HIG 13:
 - a. The draft Neighbourhood Plan compiled by HOPC broadly included all the proposed sites within Woodseaves, except for HIG 13. HOPC supports the development on all other preferred options sites within Woodseaves.
 - b. The announcement from Secretary of State for Levelling Up, Housing and Communities, Michael Gove on Monday 5th December that '*new development must have the support of local communities.*'
 - c. Concerns have been raised that there are significant strata of peat beneath the topsoil within the proposed HIG 13 site.
 - d. Should the development go ahead, adequate parking provision needs to be made for Woodseaves C of E Academy on Dicky's Lane as part of any development plan. There is already a constant, dangerous situation with parking at that location which will only be exacerbated by any increase in pupil numbers and the amplified use of Dicky's Lane as route to Stafford, caused by any large development at HIG 13.
- ii. Compared with Stone, for instance, the proposed sites for housing development in Woodseaves are disproportionate.
- iii. The sewage system within Woodseaves will need to be upgraded markedly, especially if development is permitted on the larger preferred option sites. The access to the current sewage plant in Moscow Lane is very narrow and entirely inadequate for works vehicles and tankers that attend the site in the event of a breakdown. A permanent and suitable access will need to be constructed, should significant development be permitted.
- iv. The green at Willowcroft should be included as a Green Space.

- v. Data provided by SCC Highways from the average speed cameras indicates an increase in both speeding vehicles and maximum recorded speeds along the A519 through Woodseaves. There is inadequate parking provision currently afforded for the village shop and the Cock Inn Public House, and vehicles are routinely parked in the road, or on the pavement, between both locations. Thus, parking provision adjacent to the A519 needs to be explored as part of the Local Plan, especially if traffic numbers will increase, due to new housing development.
- vi. Although Woodseaves has good road transport links with Stafford, Eccleshall and Newport, the service infrastructure in the village is lacking. Woodseaves has no doctor's surgery, fire station, or police station. Woodseaves only has one shop, one Public House, a Village Hall and a Primary School. Service providers, such as the Doctor's Surgery at Eccleshall, are reported as being unable to accommodate new patients. If proposed development sites are permitted in Gnosall, there is highly likely to be increased pressure on health care provision there to, to the detriment of High Offley, Woodseaves and Shebdon residents, if this is not addressed.
- vii. HOPC welcomes the development at Meecebrook and hopes that the utilisation of the site will ease the proposed pressure on Woodseaves and encourage a more sympathetic stance toward housing development in Woodseaves that uses infill within the current settlement boundary, rather than the development of Green Field sites.
- viii. HOPC urges a reconsideration of Policy 26 (A.3), regarding the conversion of steel-framed buildings, as their use would enable development and the use of otherwise redundant farm buildings, which would reduce the need for new-build developments within Woodseaves. Moreover, as older steel framed buildings become redundant and are replaced by larger buildings on a different footprint, able to accommodate modern agricultural machinery, they will simply become an eyesore, if they cannot be converted.
- ix. With regard to the land in High Offley Parish, that has been identified as suitable for solar farms, it is the view of HOPC that provision should be made for a substantial buffer zone between these sites and existing residential properties, especially if principal windows face any site.

Yours faithfully

Stuart Ridgewell

Clerk to High Offley Parish Council

From: [REDACTED]
Sent: 11 December 2022 17:09
To: SPP Consultations
Cc: [REDACTED]
Subject: Local Plan Review Preferred Options Consultation response from Hixon Parish Council
Attachments: 20221211 with 19 Swansmoor Drive amends.pdf

Good evening

Please see attached a response on behalf of Hixon Parish Council. Please acknowledge safe receipt.

I trust the comments will be taken into consideration as the Local Plan Review process continues.

Regards

Cllr Brendan McKeown
Chair
Hixon Parish Council

HIXON PARISH COUNCIL
RESPONSE TO STAFFORD BOROUGH COUNCIL CONSULTATION
LOCAL PLAN REVIEW PREFERRED OPTIONS OCTOBER TO DECEMBER 2022

Hixon Parish Council welcomes the opportunity to comment on the latest stages of Stafford Borough Council's Local Plan Review consultation process.

Hixon Parish Council has considered the proposed Settlement hierarchy as set out on page 34 of the preferred options booklet. The Parish Council notes that Hixon is defined as a 'larger' settlement and is placed in Tier 4 of the Settlement hierarchy table. There are no significant proposed housing development sites within Hixon Parish area.

However, the future success, or otherwise, of the Local Plan Review Preferred Options at December 2022 in terms of housing allocations sites, is largely dependent on the delivery of the Meecebrook Community Garden Village, where 3,000 housing units are proposed. However, the absence of any 'Plan B' is a matter of concern should the Meecebrook development fall short of its projected targets. A detailed time-line and schedule of development would be welcome if the Local Plan Preferred Options proposals are adopted.

Unlike previous Local Plan reviews, there does not appear to be any proposals to build relatively large housing developments in Hixon.

However, there appears to be a slight re-drawing of the Hixon residential boundary which differs from the existing Hixon residential boundary:

- 1) Land at Puddle Hill, Hixon, adjacent to existing domestic property 'Wassand'. The latest proposed Preferred Options insert map for Hixon shows the red line extended to the west beyond the existing residential development boundary into open countryside. This site is the subject of an undetermined planning application (Ref: 21/34598/FUL) which has been called into the Planning Committee for a committee decision. The reason for the Call-In is given as "land is outside Hixon Residential Boundary as defined in Hixon Neighbourhood Plan and the Adopted Plan for Stafford Borough." Including the site in the proposed residential boundary prejudices the outcome of that planning application. **The site should be removed from the proposal in the Local Plan Review 2022.**
- 2) Land at Egg Lane, Hixon, adjacent to Yew Tree House. The proposed residential development appears to delete a site for eleven houses which was permitted in January 2020 under planning application Ref 18/29383/OUT. The site is currently undeveloped and untidy. **It should remain within the residential boundary and be re-instated in the Local Plan Review Preferred Options.**

- 3) Land to north of Hall Farm Close. This site was previously included within the residential development boundary, but now appears to have been deleted from the residential development boundary. Hixon Parish Council has no other comment at this stage.
- 4) Land adjacent to 19, Swansmoor Drive, Hixon ST18 0FP. The Hixon residential boundary insert map shows a finger of land extending south-east outside the current residential development boundary. Hixon Parish Council raised the issue of the apparent unauthorised extension of the domestic curtilage of the property several years ago. An Enforcement Officer visited the site and concluded the enclosure of land outside the residential boundary was being used as a 'smallholding' for the housing of poultry etc. and found no reason to take further action. **Hixon Parish Council objects to this finger of land being incorporated into the Preferred Options 2022 proposed residential development boundary as it would create an undesirable precedent for future such unapproved development.**

Apart from points 1, 2 and 4 above, the residential development proposals and hierarchy set out in the Preferred Options statement in the latest Local Plan Review are welcome.

Hixon Parish Council welcomes confirmation in the Preferred Options consultation that the existing Recognised Industrial Estate Boundaries in Hixon are not proposed to be extended.

Comment: Over the years Hixon has accommodated relatively significant numbers of new house building sites without there being any commensurate improvement in local amenities, facilities or public transport. Any future development proposals in Hixon should address these issues.

Moving away from the housing and industrial development proposals in the Local Plan Review, it is noted that a large area of open countryside to the south west of Weston is annotated as "Potential Renewable Energy" site. The area is on a highly exposed site sloping down to the river Trent and further details would be welcome.

Notwithstanding these fairly parochial observations about Hixon and the immediate surrounding area, there are many other issues within the consultation documents on which Hixon Parish Council wishes to comment:

Policy 4: Climate Change Development Requirements;

Comment: Hixon Parish Council welcomes proposals that ensure new housing properties are built to the highest insulation standards and moving away from on-site fossil fuel consumption. In addition, to a requirement for all newbuilds to have the highest insulation standards there should be a requirement for newbuilds to be fitted with solar panels as standard where appropriate. Policy 4 is supported.

Policy 5: Green Belt;

Comment: Hixon Parish Council welcomes the confirmation that the adjacent North Staffordshire Green Belt and West Midlands Green Belt will not be altered in the Local Plan Review. Furthermore, in order to preserve green belt areas, greater emphasis and pressure should be placed on utilising brown field sites. These are not popular with developers but there are many disused sites and buildings both within the urban town areas and outside which could be utilised for housing. Policy 5 is supported.

Policy 6: Neighbourhood Plans;

Comment: Hixon Neighbourhood Plan was adopted in November 2016. Hixon parish Council is concerned that previously adopted and emerging Neighbourhood Plans may have diminished powers to influence local developments in the future. Further information required.

Policy 18: Home working and small scale employment uses;

Comment: Hixon Parish Council welcomes small scale offices of less than 100m², subject to location within the development boundary and design.

Policy 19: Town Centres;

Comment: Hixon Parish Council supports, subject to further details about how the £14.4m Government grant and matched funding will be utilised, proposals that will revitalise the high street. In particular the area between Market Square and Gaol Square in Stafford.

Policy 20; Agriculture and Forestry;

Comment: Hixon Parish Council welcomes proposals that encourage local food growing to reduce food miles, subject to appraisal of the implications on local infrastructure.

Policy 21: Tourism;

Comment: Hixon Parish Council welcomes more encouragement for people to visit the areas subject to adequate provision of parking facilities and/or improved public transport services.

Policy 22: Canals;

Comment: Hixon Parish Council supports the protection of canals and towpaths, surrounding conservation areas and green corridors.

Policy 23: Affordable Housing;

Comment: Hixon Parish Council supports the proposals for the percentage of affordable housing as set out. However, a commitment to affordable housing alone needs to be expanded to the type and size of houses. Large luxury homes are popular with developers as they bring in the money. However, the housing shortage is amongst first time buyers and housing developments should contain a much

higher proportion of smaller properties that are inevitably much more affordable but would not strictly fall within the tight definition of 'affordable housing'. Hixon Parish Council requests further details how the proposals impact on S106 developer contribution agreements.

Policy 41: Historic Environment;

Comment: Hixon Parish Council supports proposals that preserve and where appropriate enhance the significance of heritage assets.

Policy 43: Sustainable Drainage;

Comment: Hixon Parish Council supports proposals to incorporate Sustainable Drainage Systems (SuDS) subject to location and capacity reassurance.

Policy 45: Cannock Chase Area of Outstanding Natural Beauty (AONB);

Comment: Hixon Parish Council supports the conserving and enhancing the landscape of the Cannock Chase AONB.

Policy 49: Trees;

Comment: Hixon Parish Council supports proposals that encourage the planting of new trees and the protection of existing trees. Hixon Parish Council Group would like 'tree-lined' streets to be integral to the design of new housing developments.

Policy 52: Transport;

Comment: Hixon Parish Council supports proposals that minimise the use of private cars by placing developments near existing amenities and facilities and public transport. Alternatively, incorporate new amenities and facilities into the developments and/or extend public transport provision.

Policy 53: Parking and Electric Vehicle Charging Points Standards.

Comment: Hixon Parish Council supports Policy 53 proposals.

From: Joanne Harding [REDACTED]
Sent: 09 December 2022 17:19
To: Strategic Planning
Subject: FW: Stafford Borough Local Plan 2020-2040: Preferred Options consultation
Attachments: 22-12-12 HBF Stafford Preferred Options.docx

Hi [REDACTED]

I hope you are well, very long time no see and all that.

Please find attached the response of the Home Builders Federation (HBF) to the Stafford Local Plan Preferred Options consultation.

It would be greatly appreciated if you could confirm receipt of this response.

If you would like any further information, or if you have any queries, or if you would like for me to organise further consultation with the home building industry, please feel free to get in touch at the details below.

Kind regards

Joanne Harding MRTPI
[Planning Manager – Local Plans North](#)
Home Builders Federation

T: [REDACTED]
E: [REDACTED]



Strategic Planning and Placemaking,
Stafford Borough Council,
Civic Centre,
Riverside,
Stafford,
ST16 3AQ

SENT BY EMAIL

strategicplanning@staffordbc.gov.uk

Dear Planning Policy Team,

STAFFORD LOCAL PLAN 2020-2040: PREFERRED OPTIONS

1. Thank you for consulting with the Home Builders Federation (HBF) on the Stafford Local Plan 2020-2040 Preferred Options consultation document.
2. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

Policy 1: Development Strategy

3. This policy states that in the period 2020 to 2040 provision will be made for 10,700 new homes (535 new homes each year). The policy also sets out the broad spatial distribution of housing, including 59% of development in Stafford, 24% in Meecebrook the new garden community and 7% in Stone.
4. The 535 dwellings per annum (dpa) is a reduction from the adopted Local Plan which plans for 500 new homes each year for the period 2011 to 2031. However, the 535dpa is above the figure identified by the standard method local housing need (LHN) calculation which the Plan states is 391dpa in 2022. The HBF generally supports the Council in utilising a housing figure over the LHN, as the standard method identifies a minimum annual housing need figure and represents the starting point for determining the number of new homes in the area. There may be circumstances, as set out in the PPG¹, when it is appropriate to plan for a higher housing need figure than the standard method identifies. These circumstances include where there are growth strategies, strategic infrastructure improvements, an unmet need from neighbouring authorities or where previous levels of housing delivery in the area or previous assessments of need are significantly greater than the outcome of the standard method.
5. The Plan states that in addition to the Borough's own housing need, the development strategy also allows for 2,000 homes as a contribution to meeting unmet need of other

¹ ID: 2a-010-20201216



authorities in the region, which are subject to ongoing negotiations with other regional authorities.

6. The Stafford Economic and Housing Development Needs Assessment (EHDNA) (2020) identifies a range of housing needs scenarios including 435 dwellings per annum (dpa) to support the CE baseline forecast, 647dpa to support the CE jobs growth: Regeneration scenario and 683dpa to support the Past Trends scenario. The EHDNA (2020) also identifies an affordable housing need of between 252dpa and 389dpa dependent on the proportion of income used in the calculation. The EHDNA notes that this is a significant proportion of the local housing need based on the standard method. The PPG² states that an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.
7. The Borough's past rate of net housing delivery (shown in Table 1 below) against the Local Plan's housing requirement of 500 dpa highlights that over the last 10 years the Council have delivered more than 600dpa on average. This level of delivery above the standard minimum suggests that there could be a greater level of housing need in the Borough compared to that identified by the standard methodology.

	2012 / 13	2013 / 14	2014 / 15	2015 / 16	2016 / 17	2017 / 18	2018 / 19	2019 / 20	2020 / 21	2021 / 22	Average
Stafford Completions	298	246	418	688	1,010	863	699	752	614	506	609

8. The HBF considers that the housing requirement for Stafford should be increased, and that it is important that the proposed housing requirement is viewed as a minimum and barriers are not put in place which may hinder greater levels of sustainable growth. It is considered that the plan could facilitate higher levels of growth by providing greater flexibility.

Policy 4: Climate change development requirements

9. This policy requires the production of an embodied carbon assessment for all major development. Part B of the policy looks for all residential development to demonstrate net zero carbon operation all through an energy statement, it also looks for no on-site fossil fuel combustion; minimised energy use and maximisation of on-site renewables. In terms of the minimised energy the policy looks for a space heating demand of less than 15kWh/m²/year and operational energy use of less than 35kWh/m²/year. It also suggests alternatively, compliance can be demonstrated through Passivhaus Standard accreditation.
10. The HBF generally supports sustainable development and considers that the homebuilding industry can help to address some of the climate change emergency

² ID: 2a-024-20190220

³ Table 122: Housing Supply: net additional dwellings, by local authority district, England (<https://www.gov.uk/government/statistical-data-sets/live-tables-on-net-supply-of-housing>)

challenges identified by the Council. However, the HBF recognises the need to move towards greater energy efficiency via a nationally consistent set of standards and timetable, which is universally understood and technically implementable.

11. Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations were updated in 2021 and took effect from 15th June 2022, with transitional arrangements in place for dwellings started before 15th June 2023. To ensure as many homes as possible are built in line with new energy efficiency standards, these transitional arrangements will apply to individual homes rather than an entire development.
12. The Government Response to The Future Homes Standard: 2019 Consultation on changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for new dwellings dated January 2021 provided an implementation roadmap. The 2021 Building Regulations interim uplift will deliver homes that are expected to produce 31% less CO₂ emissions compared to current standards. The implementation of the Future Homes Standard 2025 will ensure that new homes will produce at least 75% lower CO₂ emissions than one built to previous energy efficiency requirements. By delivering carbon reductions through the fabric and building services in a home rather than relying on wider carbon offsetting, the Future Homes Standard will ensure new homes have a smaller carbon footprint than any previous Government policy. In addition, this footprint will continue to reduce over time as the electricity grid decarbonises.
13. As set out in the NPPF⁴, all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned. Therefore, if the Council wishes to move away from these national standards it will need to provide up to date and locally specific evidence as to why this is the case. The Council will also need to justify the requirement for the space heating demand of less than 15kWh/m²/year and operational energy use of less than 35kWh/m²/year.
14. Part E of the policy states that development must also incorporate water efficient features and equipment to achieve a maximum water usage of 110 litres per person per day. It also looks for development to demonstrate that opportunities to incorporate sustainable design features such as rainwater harvesting, green roofs, use of recycle materials and orientation have, where feasible, been maximised.
15. Under current Building Regulations, all new dwellings must achieve a mandatory level of water efficiency of 125 litres per day per person, which is a higher standard than that achieved by much of the existing housing stock. This mandatory standard represents an effective demand management measure. If the Council wishes to adopt the optional standard for water efficiency of 110 litres per person per day, then the Council should justify doing so by applying the criteria set out in the PPG⁵. The PPG references “helping to use natural resources prudently ... to adopt proactive strategies to ... take full account

⁴ Paragraph 31

⁵ PPG ID 56-013-20150327 to 56-017-20150327

of water supply and demand considerations ... whether a tighter water efficiency requirement for new homes is justified to help manage demand”

Policy 23: Affordable housing

16. This policy looks for major development to provide affordable housing, it sets differing proportions dependent on location and whether the site is greenfield or brownfield, with a range from 40% to 0%. It also sets a tenure mix of 65% social rented housing, 25% First Homes and 10% shared ownership.
17. The EHDNA identifies an affordable housing need of between 252dpa and 389dpa, dependent on the proportion of income used, it also suggests an affordable housing split of circa 70% social / affordable housing and circa 30% intermediate housing.
18. The HBF supports the need to address the affordable housing requirements of the borough. The NPPF⁶ is, however, clear that the derivation of affordable housing policies must not only take account of need but also viability and deliverability. The Council should be mindful that it is unrealistic to negotiate every site on a one-by-one basis because the base-line aspiration of a policy or combination of policies is set too high as this will jeopardise future housing delivery. The Local Plan and CIL Viability Assessment (September 2022) highlights the issues with viability in the area, and the conclusions highlight the challenges particularly in the low value and brownfield areas and for the Strategic Sites.
19. The NPPF⁷ is also clear that where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership. The HBF is concerned that the proposed policy will not deliver this requirement, if this is to be the case the HBF recommends that the Council provide the appropriate evidence.

Policy 24: Homes for Life

20. This policy states that on major developments at least 10% of all new build dwellings should be built to M4(2) standards. It goes on to state that on developments that would provide 10 or more affordable dwellings at least 10% of those dwellings should be M4(3) wheelchair accessible standard.
21. The HBF is generally supportive of providing homes that are suitable to meet the needs of older people and disabled people. However, if the Council wishes to adopt the higher optional standards for accessible, adaptable and wheelchair homes the Council should only do so by applying the criteria set out in the PPG.
22. PPG⁸ identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. It is incumbent on the Council to provide a

⁶ Paragraph 34

⁷ Paragraph 65

⁸ ID: 56-007-20150327

- local assessment evidencing the specific case for Stafford which justifies the inclusion of optional higher standards for accessible and adaptable homes in its Local Plan policy. If the Council can provide the appropriate evidence and this policy is to be included, then the HBF recommends that an appropriate transition period is included within the policy.
23. The PPG also identifies other requirements for the policy including the need to consider site specific factors such as vulnerability to flooding, site topography and other circumstances, this is not just in relation to the ability to provide step-free access.
 24. The Council should also note that the Government response to the Raising accessibility standards for new homes⁹ states that the Government proposes to mandate the current M4(2) requirement in Building Regulations as a minimum for all new homes, with M4(1) applying in exceptional circumstances. This will be subject to a further consultation on the technical details and will be implemented in due course through the Building Regulations. M4(3) would continue to apply as now where there is a local planning policy in place and where a need has been identified and evidenced.
 25. Part C also states that 100% of age restricted general housing, retirement housing or extra housing should be M4(2). As highlighted above, this policy requirement may no longer be required if the Government amend the building regulations.
 26. The Council will also need to ensure that the viability implications of the M4(2) and M4(3) requirements are fully considered in relation to the viability assessments of both market housing and older persons housing.
 27. Part D of the policy requires all new homes to as a minimum meet the nationally described space standards (NDSS).
 28. The HBF considers that if the Council wishes to apply the optional NDSS to new build dwellings, then this should only be applied in accordance with the NPPF¹⁰ which states that policies may also make use of the NDSS where the need for an internal space standard can be justified. As set out in the NPPF¹¹ all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned.
 29. PPG¹² identifies the type of evidence required to introduce such a policy. It states that 'where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:
 - **Need** – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be

⁹ <https://www.gov.uk/government/consultations/raising-accessibility-standards-for-new-homes/outcome/raising-accessibility-standards-for-new-homes-summary-of-consultation-responses-and-government-response#government-response>

¹⁰ Paragraph 130(f) and footnote 49 of NPPF 2021

¹¹ Paragraph 31 of NPPF 2021

¹² ID: 56-020-20150327

properly assessed, for example, to consider any potential impact on meeting demand for starter homes.

- **Viability** – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.
- **Timing** – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions’.

30. The Council will need robust justifiable evidence to introduce the NDSS, based on the criteria set out above. The HBF considers that if the Government had expected all properties to be built to NDSS that they would have made these standards mandatory not optional.

Policy 31: Housing Mix and Density

31. This policy looks for all new housing to contribute to the delivery of a range of housing types and sizes with the area. Part B looks for certain sites to provide plots equivalent to 1% of all dwellings to be made available to self or custom builders as serviced plots at reasonable market rates. Whilst Part C states that densities should be informed by prevailing densities, higher densities will be supported in certain circumstances.
32. The HBF understands the need for a mix of house types, sizes and tenures and is generally supportive of providing a range and choice of homes to meet the needs of the local area. The HBF recommends a flexible approach is taken regarding housing mix which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location and market.
33. The HBF would be keen to understand the evidence to support the need for custom and self-build housing in Stafford, and how it has informed the requirements of Policy 31. PPG¹³ sets out how custom and self-build housing needs can be assessed. The EHDNA¹⁴ states that the LPA has had 36 registrations of interest in Self-build plots as of December 2018 and goes on to state that therefore, the demand for self-build is considered to be limited.
34. The HBF does not consider that the Council has appropriate evidence to support the requirement for developers on the sites listed to provide service plots for custom or self-build housing. The HBF is concerned that as currently proposed this policy will not assist in boosting the supply of housing and may even limit the deliverability of some sites and homes. The HBF is also not clear whether there is even a demand from custom and self-builders to live on sites within a larger residential development scheme.

¹³ PPG ID: 67-003-20190722

¹⁴ Paragraph 14.52 of the EHDNA

35. The PPG¹⁵ sets out how local authorities can increase the number of planning permissions which are suitable for self and custom build housing. These include supporting neighbourhood planning groups to include sites in their plans, effective joint working, using Council owned land and working with Home England. The HBF considers that alternative policy mechanisms could be used to ensure a reliable and sufficient provision of self & custom build opportunities across the Borough including allocation of small and medium scale sites specifically for self & custom build housing and permitting self & custom build outside but adjacent to settlement boundaries on sustainable sites especially if the proposal would round off the developed form.
36. The setting of residential density standards should be undertaken in accordance with the NPPF¹⁶ where policies should be set to optimise the use of land. The flexibility provided by this policy in relation to certain considerations is noted, this will allow developers to react to some site-specific issues. However, further amendments could be made to create greater flexibility to allow developers to take account of the evidence in relation to market aspirations, deliverability and viability and accessibility.
37. The Council will also need to consider its approach to density in relation to other policies in the plan. Policies such as open space provision, biodiversity net gain, cycle and bin storage, housing mix, residential space standards, accessible and adaptable dwellings, energy efficiency and parking provision will all impact upon the density which can be delivered upon a site.

Site Allocation Policies

38. The HBF is keen that the Council produces a plan which can deliver against its housing requirement. To do this it is important that a strategy is put in place which provides a sufficient range of sites to provide enough sales outlets to enable delivery to be maintained at the required levels throughout the plan period. The HBF and our members can provide valuable advice on issues of housing delivery and would be keen to work proactively with the Council on this issue.
39. The Plan's policies should ensure the availability of a sufficient supply of deliverable and developable land to deliver Selby's housing requirement. This sufficiency of housing land supply (HLS) should meet the housing requirement, ensure the maintenance of a 5 Year Housing Land Supply (YHLS), and achieve Housing Delivery Test (HDT) performance measurements. The HBF also strongly recommends that the plan allocates more sites than required to meet the housing requirement as a buffer. This buffer should be sufficient to deal with any under-delivery which is likely to occur from some sites and to provide flexibility and choice within the market. Such an approach would be consistent with the NPPF requirements for the plan to be positively prepared and flexible.
40. The Council's overall HLS should include a short and long-term supply of sites by the identification of both strategic and non-strategic allocations for residential development. Housing delivery is optimised where a wide mix of sites is provided, therefore strategic sites should be complimented by smaller non-strategic sites. The widest possible range

¹⁵ ID: 57-025-20210508

¹⁶ Paragraph 125

of sites by both size and market location are required so that small, medium and large housebuilding companies have access to suitable land to offer the widest possible range of products. A diversified portfolio of housing sites offers the widest possible range of products to households to access different types of dwellings to meet their housing needs. Housing delivery is maximised where a wide mix of sites provides choice for consumers, allows places to grow in sustainable ways, creates opportunities to diversify the construction sector, responds to changing circumstances, treats the housing requirement as a minimum rather than a maximum and provides choice / competition in the land market.

41. The Council should identify at least 10% of its housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target in line with the NPPF requirements.

Delivery, Monitoring and Review

42. The monitoring framework sets out the monitoring indicator along with the relevant policies, the data source and where it will be reported. However, the indicators do not have any targets or actions associated with them, so it is not exactly clear how the indicators will be monitored and how it will be determined if any action needs to be taken to address issues with the delivery of the plan or what those actions may be. The HBF recommends that the Council amend the Monitoring Framework to include more details as to how the plan will actually be monitored, and identifies when, why and how actions will be taken to address any issues identified.

Future Engagement

43. I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.
44. The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,


Joanne Harding
Planning Manager – Local Plan (North)


From: Holly Froggatt [REDACTED]
Sent: 12 December 2022 10:37
To: SPP Consultations; Strategic Planning Consultations
Cc: [REDACTED]
Subject: Local Plan 2020-2040 - Preferred Options Consultation
Attachments: 221212 Homes England response to Preferred Options.pdf; Sandon Road MOD 4 Site - Development Statement Final.pdf

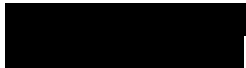
Dear Sir/Madam,

Please find attached a response from Homes England in relation to the Local Plan 2020-2040 - Preferred Options Consultation.

If you have any queries or wish to discuss the attached further, please do not hesitate to get in touch.

Kind regards,
Holly

Holly Froggatt MRTPI
Planning & Enabling Manager
Land & Development



#MakingHomesHappen

We're the government's housing accelerator. We have the appetite, influence, expertise and resources to drive positive market change. [Find out more and help make this happen.](#)

Please forward any Freedom of Information Requests to: [REDACTED]



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Please forward any requests for information to: [REDACTED]

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Making homes happen

Strategic Planning and Placemaking
Stafford Borough Council
Civic Centre
Riverside
Stafford
ST16 3AQ

Also sent to: SPPConsultations@staffordbc.gov.uk
strategicplanningconsultations@staffordbc.gov.uk

12 December 2022

Dear Sir / Madam,

Stafford Local Plan 2020-2040 – Preferred Options Consultation - Homes England Response

As a prescribed body and landowner in Stafford, Homes England would firstly like to thank you for the opportunity to comment on the Stafford Local Plan 2020-2040 – Preferred Options.

Homes England is the government's housing accelerator. We have the appetite, influence, expertise, and resources to drive positive market change. By releasing more land to developers who want to make a difference, we're making the new homes that England needs possible, helping to improve neighbourhoods and grow communities.

Homes England Support for Plan-Making

Homes England welcomes and encourages the progress being made by Stafford Borough Council (SBC) to adopt a new Local Plan for Stafford. We broadly support the Preferred Options draft including its policies and sites for allocation and reiterate our unique position as the Government's housing accelerator in continuing to work collaboratively and in partnership with SBC and key partners to help achieve ambitions of the emerging Local Plan.

Except for policies affecting Homes England's active land interests, we do not propose to comment generally on the content of specific policies contained within the Stafford Local Plan document. This is a matter for SBC to determine based on appropriate and available evidence. However, the overall role of the Plan in providing a positive and robust framework to ensure that growth is coordinated, sustainable and resilient, is supported by Homes England.

Regarding specific policies affecting Homes England's active land interests:

Policy 12. Other housing and employment land allocations – Site Reference HOPo8

Homes England supports the principle of the proposed housing allocation of land at 'MoD Site 4' (site reference HOPo8 shown on the Council's Stafford Town Inset Map). The site consists of two parcels, the MOD Site 4 and a greenfield parcel known as Land off Sandon Road. This parcel has previously had outline planning permission (application reference 14/20816/OUT) for 120 homes.

Homes England acquired the site in 2020 and can consequently directly support the delivery of housing at this site. Our involvement with the proposal will ensure that we accelerate housing delivery and unlock the site for future development within the period of the Local Plan.

This representation is supported by a Development Statement (**Appendix A**) that provides robust evidence to demonstrate the availability, achievability and deliverability of Homes England's landholdings at MOD Site 4, to which we are committed to the delivery of within the Local Plan period.

Homes England has a track record of securing planning, de-risking and delivering sites across the country. We are fully committed to bringing the Site forward for residential development at the earliest practical opportunity. The Site will be available for development (subject to planning) once the Defence Infrastructure Organisation (DIO) vacate the Site in September 2024.

A high quality, well-designed and commercially viable masterplan has been developed following a review of the Site's constraints and opportunities. It clearly demonstrates that the Site can accommodate up to 420 new homes. We are therefore confident that the Site capacity shown in the table in Policy 12 (396 homes) is achievable and request that SBC reflect our identified site capacity.

However, we wish to respond to the commentary at paragraph 12.1 of the Local Plan which is as follows;

"In accordance with the policies 1 and 2, land is allocated for housing development in accordance with the settlement hierarchy. Two sites in Stafford are marked with an asterisk () in the above table. These sites are brownfield sites within the settlement boundary that are allocated for redevelopment for housing but are not counted in the housing trajectory for the plan period. The sites in question are not currently achievable and to come forward they will need to demonstrate that they can address education capacity constraints."*

We consider that this text should be removed or amended as it does not reflect the current position regarding the MOD 4 Site.

First, there is clear evidence that the Site is deliverable in the short term and certainly within the plan period. There are no identified constraints which would make development on the Site unachievable.

Secondly, Homes England and our consultants Atkins have been liaising with Staffordshire County Council's Education Team and have sought pre-application advice related to school capacity. Our latest correspondence (dated 1 December 2022) confirms that from a School Organisation Team perspective, an education contribution towards the provision of additional primary and secondary places would be required to mitigate the impact of this development. There has been no indication that this would not be sufficient to address the demand from the development proposal or that there are unassailable education capacity constraints.

We therefore request that an update is sought to the Education Site Assessment Report, to reflect the more up to date discussions and position from the County Council.

Summary

This representation has been submitted in the spirit of partnership working and in recognition of the Agency's current and future role in the delivery of development across Stafford.

Homes England supports the work being undertaken by SBC in producing the Stafford Local Plan 2020-2040 and we look forward to continuing to work with the local authority and its partners to assist in the delivery of housing and employment growth aspirations as the Local Plan progresses towards adoption.

Yours faithfully,



Nicola Elsworth
Head of Planning and Enabling





Sandon Road / MOD 4 Site

Development Statement

Homes England

December 2022



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Summary of Intent and Deliverability

Overview

Homes England is the government's housing accelerator. Its key objective is to accelerate new residential development to help meet the much recognised local and national need for new homes, improve neighbourhoods and grow communities. Homes England is committed to helping unlock land where the market will not, to get more homes built where they are needed and deliver homes that are both affordable and suitable.

This Development Statement considers the deliverability of land off Sandon Road/ Ministry of Defence (MoD) 4 site ('the Site'), owned by Homes England. It has been prepared to support the promotion of the Site through the emerging Stafford Borough Local Plan 2020 – 2040 and support the allocation of the Site for residential development within the plan period. It demonstrates that the Site is deliverable and should be allocated for residential development in the emerging Local Plan 2020 – 2040 as it available, achievable and suitable for housing development. An outline planning application seeking consent for up to 420 dwellings on the Site has been prepared and will be submitted to Stafford Borough Council in late 2022.

Available

The Ministry of Defence (MoD) has identified that MoD 4 Site, Stafford is surplus to their requirements. Homes England acquired the Site in early 2020 to actively support the delivery of new homes on land to the north of Stafford. Homes England has combined this brownfield site with land which sits directly to the south to form a logical and cohesive development parcel on the edge of Stafford, with the intention of delivering housing. Homes England has a track record of securing planning, de-risking and delivering sites across the country.

Homes England is fully committed to bringing the Site forward for residential development at the earliest practical opportunity. The Site will be available for development (subject to planning) once the Defence Infrastructure Organisation (DIO) vacate the Site in September 2024.

Achievable

This Development Statement has considered the constraints and opportunities presented on the Site. There are no significant technical issues constraining development on the Site, and a suitable outline design has been achieved in the Outline Illustrative Masterplan which leverages the opportunities of the Site and overcomes any potential constraints. A detailed baseline review and site constraints assessment has informed the evolution of the Outline Illustrative Masterplan which has been prepared for the Site. The emerging design demonstrates a balance between residential plots, open space, sustainable drainage systems and access routes, ultimately providing up to 420 high-quality homes set in an attractive and sustainable setting.

Homes England have a track record of successfully delivering commercially viable housing schemes on similar sites, and is confident that development of the Site will be viable and therefore achievable within the Plan period. At the outline application stage, Homes England will enter into a Section 106 Agreement which will ensure the relevant contributions are made with respect to secure provision of education, sports facilities and transport and access facilities to ensure full compliance as to required developer contributions, to further underpin this Site is achievable.

Suitable

The qualities of the Site in planning terms make this land highly suitable for development. The suitability of the Site for housing has been recognised in the emerging Local Plan 2020-2040 which allocated the Site for housing (subject to addressing education capacity issues). Development would not cause significant harm to environmental interests, would be accessible via the existing surrounding road network and would complement ongoing transformation in the surrounding area taking place as part of the North Stafford Strategic Development Location (SDL). It has been demonstrated through this Development Statement that the Site is in a sustainable and accessible location for residential development.

All these measures have been considered and addressed through the evolution of an Outline Illustrative Masterplan, which demonstrates suitable and sustainable development of this Site.

1. Introduction

1.1. Overview

This Development Statement sets out the planning potential and suitability of the land within the ownership of Homes England at Sandon Road/ MoD4 Site ('the Site'), for new housing to contribute to the Council's housing requirement. This document presents an analysis of the Site, its context, and its technical suitability for development. Homes England request that Stafford Borough Council continue to recognise the importance of this Site for residential use and allocates the Site for up to 420 houses in the Stafford Borough Local Plan 2020 – 2040.

The Site (see Figure 1 below) is currently allocated for housing in the Stafford Local Plan 2020-2040: Preferred Options (2022) in Policy 12 (Other housing and employment land allocations) with the requirement that to come forward it needs to be demonstrated that the site can address education capacity constraints. The policy notes that the Site (number HOPo8) lies within the settlement boundary and has a capacity for 396 homes.

The Local Plan Site Assessment Profiles that form part of the information SBC are consulting on as part of the preferred options confirms that the site has limited environmental and technical considerations.

The Site is being promoted by Homes England. Homes England is the government's housing accelerator. It has the appetite, expertise, influence, and resources to drive positive market change. By supporting housing delivery Homes England is helping to improve neighbourhoods, grow communities and transform the housing market.

1.2. Aims and Objectives

The aims and objectives of this Development Statement are to:

- Explain that the Site is a deliverable allocation through the emerging Stafford Borough Local Plan.
- Demonstrate the deliverability of the Site.
- Consider the planning policy requirements for the Site.
- Identify the opportunities and constraints on the Site that would impact its development potential and demonstrate that there are no significant physical, environmental or technical constraints which would prevent the development of the subject land for new homes.
- Present an Outline Illustrative Masterplan including a housing capacity for the Site.

1.3. Structure of Report

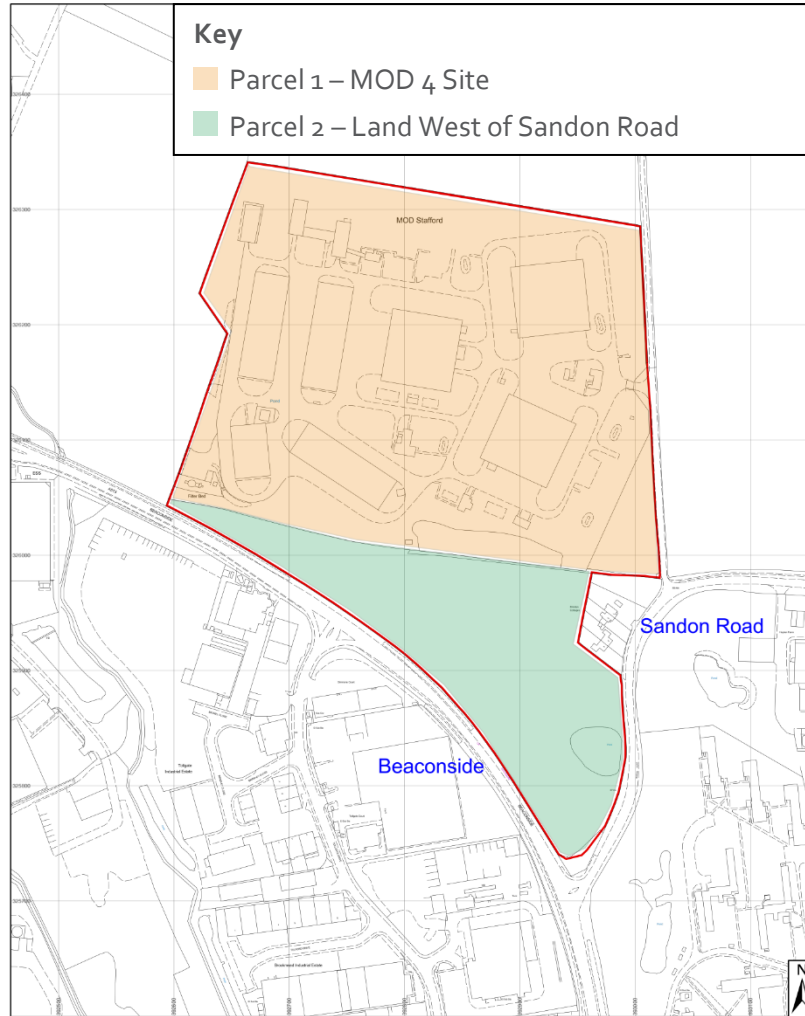
The Development Statement is structured as follows:

- Section 2: Site and Surrounding Context
- Section 3: Opportunities
- Section 4: Outline Illustrative Masterplan



- Section 5: Planning Requirements
- Section 6: Technical Considerations
- Section 7: Conclusion

Figure 1 – Site Location



2. Site and Surrounding Context

2.1. Site

The Site which forms the basis of this Development Statement comprises of two parcels of land which collectively extend to 16.01 hectares in size. Parcel 1 refers to the MOD 4 Site and Parcel 2 refers to land to the west of Sandon Road.

MoD 4 Site (Parcel 1) has been identified as being surplus to defence requirements. Homes England have acquired the freehold interest from the Defence Infrastructure Organisation (DIO) subject to a short-term lease back arrangement up until September 2024. The land currently includes several large warehouses and smaller auxiliary buildings associated with the MoD uses. Grassed areas surround the buildings. There are also large areas of hardstanding and roadways with several small underground bunkers (thought to be former air raid shelters) across this part of the Site. There is an on-site sewage treatment plant in the south-west corner and a sub-station in the centre of this parcel of the Site.

The remainder of the Site (Parcel 2) comprises land to the west of Sandon Road and forms the southern area of the Site. The land is currently vacant land with no buildings present. The notable site features include a pond surrounded by trees; utility pylons; and two mature trees.

2.2. Surrounding context

The Site is located to the north of the Town of Stafford, approximately 2.6 kilometres from Stafford town centre. Beaconside (A513) is located immediately south of the Site, which is a major road (50mph speed limit). Sandon Road (B5066) runs adjacent to the southeast portion of the Site before heading east towards Hopton. The Tollgate Industrial Estate is located on the opposite (south) side of Beaconside and comprises one of the main industrial estates in Stafford. A Public Right of Way and bridleway runs adjacent to the eastern boundary of the Site.

Land surrounding the Site to the north, east and west is currently greenfield but is identified as forming the North of Stafford SDL. The SDL is allocated in the current Local Plan in Policy Stafford 2 (North of Stafford) for the delivery of 3,100 homes and 36 hectares of employment land. The SDL surrounds the Site, as indicated by Figure 2. There are several developers active within the SDL designation, with planning permissions granted for significant number of homes with associated local facilities and services. The area immediately adjacent to the west, north and north-east of the Site forms a key part of the SDL and currently has outline consent for up to 2,000 dwellings alongside new schools, local centres, health centres, parks and other supporting infrastructure (application number 16/25450/OUT).

2.3. Planning History

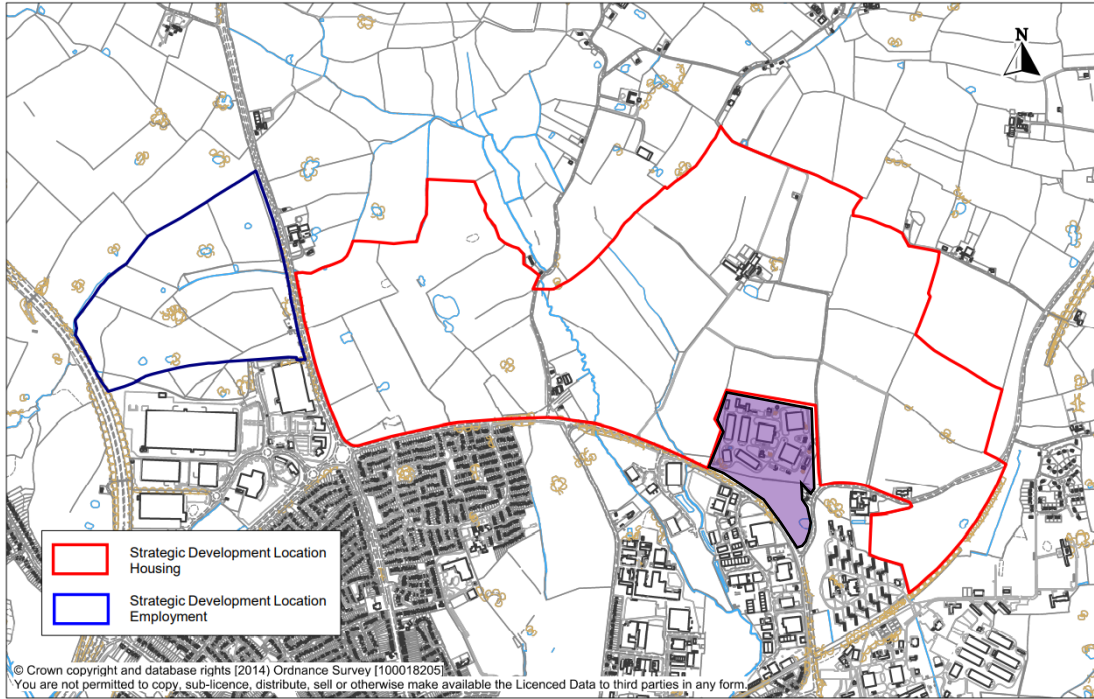
There is no relevant planning history for parcel 1 (MoD Site).

The relevant planning history for parcel 2 (Land Between Beaconside and B5066 Sandon Road Hopton Stafford Staffordshire) includes the following planning applications which were made by the previous owner of the land (St Philips):

- Ref: 14/20816/OUT. Outline application for redevelopment of site to form up to 120 dwellings including formation of new vehicular access onto Sandon Road. All other matters reserved. Approved (lapsed in 2020)

- Ref: 18/29161/REM. Reserved Matters application for redevelopment of site to form up to 120 dwellings including details of the appearance, landscaping, layout, and scale. Refused.

Figure 2 - The North of Stafford SDL and the Site shaded in purple (source: Stafford Borough Council, Plan for Stafford Borough 2011-2031)



3. Opportunities

The Site has the following opportunities:

- To contribute up to 420 new homes towards meeting housing targets outlined in the emerging Local Plan 2020 – 2040 in a sustainable location, making best use of a brownfield site in the settlement boundary. The land is owned by Homes England, the government's housing delivery accelerator, delivery of housing will be a key priority.
- To provide purposeful new open space for new residents on the Site and for adjacent areas with the focal point being the local park proposed to the north east of the Site.
- To retain and enhance the role and importance of landscape features as drivers for the redevelopment of the Site. Trees, hedges and an existing pond are present and could be integrated into the landscape strategy.
- To deliver a mix of housing sizes and tenures of much needed new homes to satisfy local needs in the settlement boundary of Stafford including the provision of up to 30% affordable housing.
- To provide sustainable connections to the North Stafford SDL, ensuring opportunities for the future new homes on the Site to utilise the future local facilities and services in this wider development area.
- Supporting healthy lifestyles and reduced car movements by increasing pedestrian and cycle links into the Site from surrounding areas. This has the opportunity to create safe and legible cycling and pedestrian corridors which will encourage travel by foot or bicycle within the Site and to neighbouring areas.

4. Outline Illustrative Masterplan

4.1. Design Approach

The Outline Illustrative Masterplan developed for the Site shows how the land could be developed in a way that works with the Site's constraints and maximises the opportunities to create a high-quality residential development. Based on the masterplan, the Site could accommodate up to 420 new homes with 30% of these units being affordable.











The Outline Illustrative Masterplan seeks to optimise the efficiency of the re-use of brownfield land while creating purposeful open space in a development layout that is highly connected to the neighbouring North Stafford SDL and urban fringe of Stafford. Underpinning the masterplan are three design drivers:

- Landscape-led design and preservation of environmental features;
- Access and Infrastructure;
- Neighbourhood Placemaking and Character.

These concepts are specific responses to particular site features, wider design aspirations and best practice design approaches for new housing development.

4.2. Landscape-led design and preservation of environmental features



-  Site boundary
-  Existing planting / hedgerows
-  Existing trees
-  Tree Preservation Order (TPO)
-  Open space
-  Focal Greenspace
-  Green street links
-  Green - blue spine
-  Integrate surface water attenuation into landscape design
-  Integrate variety of play space into open space

1. The design aims to retain and enhance existing environmental features. Trees, hedges and an existing pond have been integrated into the main open space along the southern edge of the Site. Drainage ponds are also located within this greenspace.
2. A local park and community space is proposed within the Site, located to integrate with existing large trees and to be within easy walking distance to all parts of the development.
3. Drainage ponds and linked planted ditches to manage water and direct flow will be integrated into the open space network to support and enhance ecological habitats and on-site biodiversity. The 'central spine' route through the site functions both as a drainage corridor and a landscaped greenspace to provide a pleasant and attractive environment.
4. A potential key east-west green street connection is proposed to create an easily understood layout that links well into the wider Strategic Development Location masterplan and proposed (off-site) local centre.
5. A network of green streets and pocket parks are proposed that connect greenspaces for play, recreation, and aesthetic purpose. This will not only create attractive street-scene but also provide additional ecological benefits.

4.3. Access and Infrastructure









1. Access into the Site will be provided from Beaconside in the form of a new roundabout, combined with new landscaped areas. Secondary access to the Site will be provided via Sandon Road (serving approximately 60 dwellings).
2. A clear hierarchy of streets will be provided creating a street layout with key buildings in important locations, with narrower, less busy streets on the site periphery suited to play and reduced lighting to support site ecology.
3. The aim is to maximise the use of shared-surface streets. These street types will be slow traffic to support a strong neighbourhood feel.
4. Pedestrian and cycle points will be provided in convenient locations.



4.5. Neighbourhood Placemaking and Character



-  Key green focal space
-  Landmark building
-  Spine character frontage
-  Edge character frontage
-  Green street character
-  Shared surface space / Playstreet

1. The development will form a direct relationship with the wider North Stafford SDL, creating opportunities for new pedestrian and cycle links. New homes along key spaces will help create a new sense of identity of place.
2. The structure, scale and mix of development will be residential-led with a focus on well-designed spaces that encourage neighbourliness and a sense of belonging.
3. A series of focal points and spaces within the development layout will help create place identity. Landmark buildings will be used to form gateways adding to a sense of place.

4.7. The Outline Illustrative Masterplan



This Outline Illustrative Masterplan suggests the way in which development might come forward, subject to further detail. The layout has been designed to create an area that is distinctly green, where landscape design plays a key role, and where new homes sit within easy access of green spaces.

Where new infrastructure is required, this has been designed to blend in with the landscape through planting or contouring of earthworks, and to be accessible, meaning more of the Site is available for play, recreation, or simply taking a quiet walk.

The 'front garden' of the Site – the new landscape created along Beaconside, will soften the form of new homes. This will create a pleasant frontage to the Site, a place where people will aspire to live.

5. Planning Policy Context

This section sets out the planning policy context within which future planning applications for the Site falls to be determined at both the national and local level. These policies have been considered in developing the design for the Site

5.1. National Planning Policy

The National Planning Policy Framework (NPPF) (2021) sets out the Government's planning policies for England. The following chapters of the NPPF are particularly relevant to this Site:

Section 5 'Delivering a sufficient supply of homes' notes that a variety of land can come forward to support the government objective of significantly boosting the supply of homes. This section addresses affordable housing and states that at least 10% of the total housing proposed is to be affordable housing. Paragraph 72 highlights the importance of large-scale developments to be in suitable and sustainable locations, supported by the necessary infrastructure and facilities.

Section 12 'Achieving well-designed places' notes that good design is key to sustainable development. Development proposals should function well and be visually attractive while being sympathetic to the local character of the area. A strong sense of place should be established through high quality street design, public spaces, and building types, which create safe, inclusive and accessible spaces.

5.2. Local Planning Policy

The Local Plan 2011-2031 covering Stafford Borough comprises the following adopted documents:

- The Plan for Stafford Borough – Part 1 (adopted 19 June 2014) manages where new development (such as housing, shops and green spaces) can take place over the next 20 years.
- The Plan for Stafford Borough – Part 2 (adopted 31 January 2017) details settlement and Recognised Industrial Estate boundaries together with a policy for protecting community / social facilities.
- Neighbourhood plans for Gnosall, Eccleshall, Colwich, Hixon, Barlaston and Stone. The Neighbourhood Plans will be used to determine planning applications within the relevant Parishes alongside the adopted Plan for Stafford Borough Parts 1 and 2.

The Plan for Stafford Borough (part 1) covers the time period 2011 – 2031. The plan sets out the spatial plan for Stafford and outlines policies for the local area. The planning policies relevant to delivery of housing are outlined below.

Spatial Principle 2 'Stafford Borough Housing & Employment Requirements' identifies that throughout the Borough, provision will be made for the development of 500 dwellings per year over the plan period, as well as approximately 8 hectares per year of employment land to provide for the future needs and prosperity of residents.

Policy Stafford 1 'Stafford Town' sets out the strategy for Stafford town with the aim of enhancing its role through increasing both the range and quality of services and facilities (the Site is located within the settlement boundary of Stafford). In terms of housing, the policy states the requirement to: *'Continue to meet the housing requirements for Stafford Town by providing a total of 7,000 new market and affordable homes...'*

Policy Stafford 2 'North of Stafford' sets out the policy aims for the North of Stafford SDL (see section 2 above). The SDL site will deliver approximately 3,100 homes with 30% being affordable housing in the context of Policy C2 through a mix of housing types, tenures, sizes and styles. Transport will maximise travel and accessibility by non-car modes of transport, which are safe, attractive and provide convenient pedestrian and cycling connections. Highway improvements are required along Beaconside.

Parcel 1 of the Site is identified as MOD Protected Land on the Part 2 proposals map. In relation to this protected land, the Part 2 plan refers to Policy Stafford 1 of the Plan for Stafford Borough. The policy states that "*the Plan supports further development of MOD land at Stafford as a military base in the West Midlands.*" This land is now deemed surplus to requirements for MOD use.

6. Technical and environmental Considerations

6.1. Overview

This section considers the following constraints and opportunities with respect to the Site, which are considered and addressed in the outline illustrative Masterplan:

- Transport and Access;
- Education
- Ecology;
- Flood Risk and Drainage.;
- Trees;
- Ground Conditions.;
- Air Quality;
- Noise;
- Heritage and Archaeology; and,
- Services.

6.2. Transport and Access

A Transport Assessment has been carried out to inform the design proposals. It concluded that safe and suitable access to the Site can be achieved for all users, and the predicted impacts from the development on the transport network are not considered significant. To create a safe and suitable site access, the proposed site access will utilise the A513 Beaconside and Tollgate Drive Junction to create a four-arm junction.

In addition, a local access is proposed off B5066 Sandon Road via a priority-controlled junction providing access to properties in this section of the Site (approximately 60 dwellings). This access is in the same location as that consented in the 2017 planning permission for the Parcel 2 Site.

Furthermore, the Site benefits from access to existing walking and cycling facilities on the southern side of the A513 Beaconside, providing links into Stafford via sustainable transport options and the adjacent network of Public Rights of Way.

6.3. Education

Local Plan Preferred Options Policy 12 highlights the need to address education capacity constraints on the Site in order to bring it forward for development. Discussions have taken place with the Staffordshire County Council education authority to date, which have outlined the likely education contributions that would be required to bring the Site forward, which are acceptable to Homes England. Our latest correspondence with the education authority was 1st December 2022.

Therefore, education capacity is not considered to be a constraint to bringing development forward on the Site.

6.4. Ecology

The potential ecological opportunities and constraints of the Site have been identified through three assessments: Biodiversity Net Gain Assessment, Ecological Impact Assessment and a Habitat Regulation Assessment (HRA) screening.

Features within the Site currently support great crested newt, roosting bats and foraging and commuting bats. The Site also has the potential to support badger, nesting birds and hedgehog. All of the above species, have the potential to be impacted by future development. With the application of general and specific mitigation during the construction phase and embedded within the design, no significant residual effects on important ecological features are predicted.

The HRA states that future development of the site for residential use could result in a likely significant effect on the Cannock Chase Special Area for Conservation (SAC), primarily through increased visitor pressure. To mitigate likely significant effects, the HRA proposes measures including:

- A minimum financial contribution to habitat management, access management and visitor infrastructure at Cannock Chase SAC.
- Publicity, education and awareness raising for residents regarding the importance of Cannock Chase SAC and how it can be preserved;
- Provision of additional recreation space within the Site, or where this is not possible, financial contributions to offsite alternative recreation space.
- Measures to encourage residents to utilise sustainable travel.

These measures will be adopted in bringing development forward on the Site. There is therefore no reason in ecological terms why the Site could not be developed.

6.5. Flood Risk and Drainage

A Flood Risk and Drainage Assessment has shown that the Site lies wholly within Flood Zone 1: Low Risk, and as such is suitable for all types of development components which form part of the Outline Illustrative Masterplan, as defined by NPPF and Planning Practice Guidance.

The FRA identifies that surface water and ground are potential sources of flooding. The risk associated with fluvial, tidal, sewers and artificial sources are minimal. To manage any potential risks of flooding, modifications to the ground profile of the Site will eliminate isolated depressions, surface water will be directed away from buildings, and a positive surface water system will intercept run-off from roofs and paved areas. SuDS are also incorporated into the masterplan with associated attenuation ponds and swales integrated into the landscape plan within the Outline Illustrative Masterplan.

6.6. Trees

An Arboricultural Implications Study has been prepared to inform the design of the Outline Illustrative Masterplan. Where possible, existing trees and hedgerows on the Site are retained. In particular, three trees towards the south of the Site covered by Tree Preservation Orders are retained.

6.7. Ground Conditions

Based on the Ground Investigation report, at this stage it is considered that the Site is likely to be suitable for the residential development with respect to ground contamination issues. Further investigation and assessment of site ground conditions would be required at the future detailed design stage.

6.8. Air Quality

An air quality assessment has been undertaken. The report concludes that development of the site is unlikely to have a significant effect at existing receptors, is not considered to place sensitive receptors in areas of existing poor air quality, and with the implementation of mitigation measures, dust generated from construction will not be significant.

6.9. Noise

An initial site noise risk assessment has been conducted, indicating that during daytime periods the majority of the Site falls under a low to negligible risk and during night-time periods the majority of the Site falls under a low to medium risk, again, with a high risk experienced within approximately 30 metres of the A513 Beaconside site boundary. An assessment of potential noise impacts from the proposed HS2 route to the north of the Site has been conducted, indicating that the noise impact will be negligible on new homes on the site.

An assessment of potential industrial noise impacts from the adjacent Tollgate Industrial Estate has been conducted indicating that typically noise impacts would be low to adverse, depending on the context. Within the context of a mixed residential and industrial area adjacent to a main arterial road, the impact of industrial noise on proposed dwellings would be low provided that suitable mitigation measures in the form of site layout, property orientation, and façade insulation treatment are appropriately considered at future design stages.

6.10. Heritage and Archaeology

The Site is not located within a conservation area and there are no listed buildings on or proximate to the Site.

Future development has very limited potential to impact on the historic environment within the immediate area of the Site. To mitigate any potential impact on the historic environment, a programme of phased archaeological investigation is proposed to be undertaken using nonintrusive and intrusive techniques to initially develop a robust understanding of the archaeological potential of the Site in order to develop a suitable approach to mitigation. The nature and scale of this phased programme of archaeological investigation would be developed in consultation with the Staffordshire County Council archaeological advisor(s) (prior to the commencement of development) and be undertaken in accordance with a Written Scheme of Investigation. This will be agreed as part of a subsequent discharge of conditions application.

6.11. Services

Searches of the main utility providers have been carried out. These have confirmed that all main services are available in this locality, and that connections can be made.

7. Deliverable Allocation

The Site represents a suitable and deliverable site for new housing to support a contribution towards Stafford Borough Council's housing supply. The Site is located in a sustainable location with opportunities to establish connections to the adjacent to North Stafford SDL and its associated local facilities and services. The Site is also available for development in the short term (beyond September 2024 when MOD 4 Site is vacated). A summary of the key points established in this design statement are set out below:

- A high quality, well designed, sustainable and commercially viable masterplan has been prepared for the site based on a robust and sound technical basis. The design is sympathetic to the existing site surroundings and integrates with the future planning North Stafford SDL. Full consideration has also been given to the planning history of the Site ensuring that key issues identified through previous planning applications have been fully appreciated through the design.
- New homes on the Site would include a range of types and tenure to meet local demand. It is intended that the homes would consist of a range of types and tenure, in order to meet local demand. It is proposed that up to 30% of the new dwellings on Site are to be provided as affordable homes in accordance with the SBC Local Plan.
- Full consideration has been given to the existing site characteristics identified by the supporting technical evidence, with a focus on ensuring the design responds to and where possible enhances the natural environment.
- Access to and from the site and the impact on the local highway network have been considered in developing the design of the Outline Illustrative Masterplan. Two vehicular access points have been proposed from Beaconside and Sandon Road providing safe access to the site along with the provision of a number of pedestrian/cyclists links around the Site.
- The Outline Illustrative Masterplan includes for the provision of public open space on the Site in line with SBC policy on provision of such open space within new housing developments. It is intended this will be achieved through a combination of the local park, informal play areas, and green infrastructure network and open space alongside movement corridors within the Site.
- The design incorporates a surface water drainage system (primarily through the use of swales and four water retention basins) to ensure that the Site can be adequately drained ensuring no impact on the existing drainage in the local area.

An assessment of the technical and environmental considerations affecting the Site confirms that it is **suitable** for development, and that a development of the scale outlined above would be **achievable** (including through section 106 contributions). As confirmed in the SBC Site Selection Assessment for the emerging Local Plan, and in this Development Statement, the Site does not have any significant technical constraints that could prevent or significantly limit its development and accordingly is **deliverable**.

The Outline Illustrative Masterplan has been developed following a review of the Site's constraints and opportunities. It clearly demonstrates the Site can accommodate up to 420 new homes comprising a mix of housing to meet local housing needs and provides for a substantial amount of open space.

Development of the Site for residential use would result in the delivery of a sustainable residential community within Stafford. There are opportunities for the Site to connect to surrounding areas, including the SDL, through the proposed pedestrian and cycle links. In addition, a safe and accessible environment for the Site has been shown through suitable vehicle and pedestrian access points.

The Site is considered to be fully **available** for development. The Site lies within Homes England's ownership who have an established track record of successfully de-risking, consenting and delivering similar sites for new homes.

The detail presented within this statement make it clear that the Site this land highly suitable for development once MOD 4 Site is vacant. A planning application is being prepared for the Site and is scheduled for submission in late 2022.

7.1. Conclusion

The Site represents a suitable, available and deliverable site for new housing to contribute towards Stafford Borough Council's housing supply. The Site is in a highly accessible location within easy reach of Stafford Town centre and lies adjacent to the North Stafford SDL. As has been demonstrated the Site is deliverable and is suitable, available and achievable. Overall, there is a very strong planning case to justify its allocation for housing in the emerging Local Plan.



Homes
England

ATKINS

Member of the SNC-Lavalin Group

Atkins Limited



From: Town Planning [REDACTED]
Sent: 22 November 2022 09:54
To: Strategic Planning Consultations
Subject: CRO Stafford Borough Local Plan 2020-2040: Preferred Options consultation

Our ref: HS2-STC-PE-010

Dear [REDACTED]

Thank you for consulting HS2 Ltd on the above consultation.

Having reviewed the Preferred Options as set out in the Local Plan, I can confirm that HS2 Ltd have no specific comments to make at this stage of the consultation.

Kind regards

Reiss Graham | Town Planning Advisor – Phase Two | **Infrastructure Directorate** | HS2 Ltd

[REDACTED]
High Speed Two (HS2) Limited, [REDACTED] | www.gov.uk/hs2

From: Philip Sharpe [REDACTED]
Sent: 21 November 2022 10:26
To: Strategic Planning
Subject: Borough Plan consultation - IWA response
Attachments: CPSTA55 Local Plan Preferred Options.doc

To: [REDACTED]

Stafford Borough Local Plan 2020-2040: Preferred Options

Please see attached our response to your consultation on the above.

Regards,

Philip G. Sharpe

Planning Officer
Inland Waterways Association, [REDACTED]
[REDACTED]
[REDACTED]

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Registered Charity No 212342. Registered Office: [REDACTED]
Website: www.waterways.org.uk

IWA Lichfield Branch,
 [REDACTED]

Our Ref: CPSTA55

[REDACTED]
 Stafford Borough Council
 by email to: strategicplanning@staffordbc.gov.uk

21st November 2022

Dear [REDACTED]

Stafford Borough Local Plan 2020-2040: Preferred Options

Thank you for consulting us on the Preferred Options Local Plan. We are responding by letter as the Consultation Response Form box would not expand sufficiently to accommodate all our comments relating to Policy 22.

Inland Waterways Association

The Inland Waterways Association (IWA) is the only independent, national charity dedicated to supporting and regenerating Britain's navigable rivers and canals as places for leisure, living and business.

IWA has a network of volunteers and branches who deploy their expertise and knowledge to work constructively with navigation authorities, national and local government and a wide range of voluntary, private and public sector organisations for the benefit of the waterways and their users. The Association also provides practical and technical support to restoration projects through its Restoration Hub.

IWA is a consultee for planning policy and applications affecting the canal system and the Lichfield Branch of IWA, which covers the southern part of Stafford Borough, has responded to previous Local Plan consultations in relation to the environment of the canals and the interests of their users.

IWA welcomes the continuation of a specific policy on Canals which recognises their tourism and conservation values. We are generally supportive of Policy 22. Canals on the provision of facilities and infrastructure, and particularly welcome its support (at item 8) for restoring redundant canals, but are disappointed that the unnecessary restrictions on residential moorings outside settlement boundaries and on the provision of facilities (items 3 i. and ii.) have been repeated from Policy E7 Canal Facilities and New Marinas of the current Local Plan.

Please see our detailed response below.

Yours sincerely,

Philip G. Sharpe
 Chairman & Planning Officer
 Inland Waterways Association
 Lichfield Branch

Registered Office: [REDACTED]
 Tel: [REDACTED] Web: www.waterways.org.uk
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POLICY 22. Canals

A. Residential Moorings & Facilities

IWA is generally content with the provision that Policy 22. Canals makes for canal related facilities and infrastructure, but considers that the following limitations for sites outside settlement boundaries should be removed from the policy:

- 3. i. there are no permanent moorings for residential purposes;**
- 3. ii. where the proposal comprises a marina or moorings it has only limited service facilities;**

Residential Moorings

The popularity of the canal system for recreational boating has been steadily growing for many years and an increasing number of boat owners are choosing to live on board for extended periods or as their main residence. Whilst some move around frequently as “continuous cruisers” others choose to spend longer periods, especially over the winter, moored in one place. This may be on “linear” or bankside moorings with limited facilities but there is an increasing demand for residential moorings in established marinas with better access, facilities and as part of an active community.

It is normal practice nowadays around the country for canal boat marinas to include a proportion of residential berths. Not only does this provide for the increasing numbers of people choosing to live on canal boats, but their presence contributes greatly to the security of the whole site. An appropriate percentage of residential berths for individual sites will vary according to local circumstances. But if sufficient numbers of properly serviced berths are not provided in marinas or at other mooring locations through the planning system where they can be subject to appropriate controls, then residential boaters will have no choice but to moor in other locations along the canal system which may have greater visual impact on the countryside. Such unofficial residential moorings are also less likely to contribute to Council Tax.

IWA’s Policy on Residential Boating is to encourage the inclusion of residential berths when new marinas or mooring sites are being developed. IWA encourages local authorities to approve applications for residential moorings where such proposals meet the sustainability and environmental criteria in the Local Development Plan. For further information, see: <https://waterways.org.uk/about-us/library/policy-on-residential-boating>

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 Local Plan should therefore make provision for residential moorings to meet the needs of the established, legitimate, distinctive and growing residential boating community, in accordance with national policy advice.

However, settlement boundaries which relate to residential buildings in towns and villages are not an appropriate criterion for the location of residential boats. Boats have much less visual impact than buildings and moorings can only be provided where canals exist; not just in built settlements. Other provisions of the policy protect the Green Belt and the countryside, and each case should be decided on its merits against these and other provisions and policies in the Plan.

Due to limited land availability and land prices, new moorings are unlikely to be developed within settlement boundaries, and larger marinas are generally in rural areas, although some may be in proximity to a settlement. Within Stafford Borough the larger marinas at Great Haywood and Aston-by-Stone and the permitted marina at Shirleywich illustrate this point.

Banning residential moorings outside settlement boundaries would in effect prevent any residential moorings within Stafford Borough, which includes an important part of the national canal network.

There is no justification for this blanket restriction which would be at odds with other local authorities, fail to cater for the established needs of a growing community, be counter-productive with respect to Council Tax, and be contrary to national planning guidance.

Facilities

It is not clear what is covered by “limited” service facilities. The level of facilities provided with boat moorings varies, often with the number of berths. Some linear canal moorings may provide little more than access, with or without car parking. Other moorings, especially marinas often provide water and electricity to individual berths, along with refuse and sewage disposal. Larger marinas may have a sewage pump-out, and maintenance and repair facilities with a slipway or dry dock.

IWA considers that all new marina moorings, wherever located, should provide at least the basic facilities of water, refuse, electricity and sewage disposal. For further information, see:

<https://waterways.org.uk/about-us/library/policy-provision-of-boaters-facilities>

Due to limited land availability and land prices, new moorings are unlikely to be developed within settlement boundaries, and larger marinas are generally in rural areas, although some may be in proximity to a settlement. Wherever moorings are permitted, it is not in the public interest to seek to deny their users the provision of basic facilities on-site.

It is therefore inappropriate for the Borough Plan to include a blanket but undefined limitation on service facilities for moorings outside settlement boundaries, and each case should be decided on its merits against other provisions and policies in the Plan.

Conclusions

Policy 22. Canals

3.i. This condition should be amended to:

There are a limited number of permanent moorings for residential purposes, appropriate to the location.

3.ii. This condition is inappropriate and should be removed.

B. Canal Restorations

Policy 22. Canals includes the welcome criteria that:

8. Wherever possible redundant canals and related buildings are restored and re-used;

However, The Plan for Stafford Borough 2011-2031, Policy E7 supporting text at 9.29 includes the following:

The extensive canal network has significant potential for restoration and expansion. The Newport Branch Canal formerly linked the Shropshire Union Canal at Norbury Junction to Newport and to the Shrewsbury Canal; its restoration is being progressed by the Shrewsbury & Newport Canals Trust. The Stafford Riverway Link Community Interest Company has been established to promote the restoration of the historic canal and river link from the Staffordshire & Worcestershire Canal to Stafford town centre.

Since the Plan was adopted in 2014 both these projects have made significant progress, particularly in the last few years. It is disappointing therefore that they are not now specifically mentioned in the supporting text for the equivalent new Policy 22. Canals. Although progress on the Shrewsbury & Newport Canals has been mostly outside Stafford Borough, the Stafford Riverway Link project is actively restoring the canal basin at Baswich as the first phase of their plans.

Stafford Riverway Link

Restoration of the historic canal basin at Baswich has planning permission from Stafford BC, along with reconstruction of a bridge to connect it to the Staffordshire & Worcestershire Canal. The work is being carried out largely by volunteers, funded by their membership, donations, grants and material contributions in kind, and supported by local businesses, environmental and educational bodies. More details of the project, its support, progress and plans for future phases of the restoration, including improvements to the River Sow towpath, can be provided by Stafford Riverway Link CIC.

Therefore, Policy 22 should reinstate text to explain the support in item 8 for restoring redundant canals, and IWA suggests including the following update, as a minimum:

The extensive canal network has significant potential for restoration and expansion. The Newport Branch Canal formerly linked the Shropshire Union Canal at Norbury Junction to Newport and to the Shrewsbury Canal; its restoration is being progressed by the Shrewsbury & Newport Canals Trust. The Stafford Riverway Link Community Interest Company is promoting the restoration of the historic canal and river link from the Staffordshire & Worcestershire Canal to Stafford town centre. Reconstruction of the former canal basin at Baswich is underway and future phases will improve the footpath along the River Sow and enhance the river channel for recreational boating.

IWA has recently published a report “Waterways for Today” which provides evidence and case studies of how improving waterways and restoring abandoned canals and rivers can benefit the economy, enhance the natural and built environment, support local communities and improve people’s lives. See: <https://waterways.org.uk/waterwaysfortoday>

Other Policies

Restoration of the Stafford Riverway Link also complies with and compliments several other Local Plan policies, including policies 3, 14, 21, 41, 42 & 46 (as below):

POLICY 3. Development in the open countryside – general principles

The policy supports:

- 4. Tourism development, consistent with Policy 21 and development at canals consistent with Policy 22; and**
- 5. Recreation uses appropriate to a rural location;**

Restoration of the Stafford Riverway Link is an appropriate rural recreational and tourism development.

POLICY 14. Penk and Sow Countryside Enhancement Area

The policy promotes nature conservation and recreational access in the Penk and Sow river valleys:

- A. Penk and Sow Countryside Enhancement Area as identified on the policies map will be conserved and enhanced to provide a major nature conservation and recreational resource for the town of Stafford.**
- B. A masterplan for the delivery of the Countryside Enhancement Area will be prepared. The masterplan will identify actions to improve the area’s biodiversity, public access, flood plain management and contribution to climate change adaptation.**

Supported by IWA, the Stafford Riverway Link CIC welcomes the opportunity to work with the Borough Council, Wildlife Trust, Environment Agency and others to integrate their plans for enhanced recreational access with biodiversity and flood management objectives.

POLICY 21. Tourism development

The policy supports small scale tourism outside town and local centres provided:

- 2. They are of an appropriate scale and type for their location; and**
- 3. They demonstrate high-quality design and respect the character of the countryside or townscape in which they are located.**

Restoration of the Stafford Riverway Link is a small scale tourism development that will bring visitors into the town centre along a route which respects the countryside character. The basin development at Baswich is of appropriate scale and high-quality design.

POLICY 41. Historic environment

The policy includes:

- B. Development proposals shall preserve and where appropriate enhance the significance of heritage assets and their settings by being based on an understanding of the heritage interest, taking opportunities for sustainable re-use and achieving high design quality.**

Restoration of the Stafford Riverway Link will preserve and enhance a heritage asset for sustainable re-use whilst achieving high quality design.

POLICY 42. Flood risk

The policy permits development in flood risk areas provided that:

- 1. The vulnerability of the proposed use is appropriate for the level of flood risk on the site; and**
- C. Development proposals within Flood Zone 2 and Flood Zone 3 must be appropriately flood resilient and resistant, including providing for safe access and escape routes where required**

Restoration of the River Sow section of the Stafford Riverway Link will be designed to contribute to flood risk reduction. Improvement of the riverside footpath between Fairway and Baswich will be designed to be flood resilient and provide improved safe access and escape routes. It is accepted that navigation cannot occur whenever the river is in flood, and an appropriate warning mechanism will be provided at the connecting lock from the canal.

POLICY 46. Green and blue infrastructure network

The policy is to protect, enhance and extend the existing green and blue infrastructure network of habitat, open spaces and waterscapes, by:

- 1. Creating and improving connectivity for people and nature by providing better links between urban and rural landscapes, enabling communities to make regular contact with the natural environment, by encouraging walking, cycling and horse-riding;**

Restoration of the Stafford Riverway Link will enhance the green and blue infrastructure network and waterscape by improving urban and rural connectivity for people to interact with the natural environment.

From: Lauren Lymer [REDACTED]
Sent: 09 December 2022 16:05
To: Strategic Planning
Cc: [REDACTED]
Subject: LDC response to SBCs Local Plan Preferred Options
Attachments: SBC Preferred Options LDC response.pdf

Good afternoon,

Please see attached Lichfield District Councils response to Stafford Borough Councils Local Plan 2020-2040 Preferred Options consultation.

Kind regards,
Lauren

Lauren Lymer
Spatial Policy and Delivery Officer
Lichfield District Council

[REDACTED]
[REDACTED]
[REDACTED]



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WE

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Lichfield district council

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Your ref Stafford BC Preferred Options

Our ref

Ask for

Email

Lichfield
district council

[REDACTED]
Strategic Planning & Placemaking Team
Stafford Borough Council
Civic Centre
Riverside
Stafford
ST16 3AQ

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
9th December 2022

Dear [REDACTED]

Stafford Borough Council Local Plan 2020-2040 – Preferred Options Consultation

Thank you for the opportunity to respond to the Stafford Borough Local Plan 2020-2040: Issues and Options Consultation.

As Lichfield District is a neighbouring authority to Stafford Borough the Preferred Options document has been given careful consideration as it could have development and infrastructure implications for the District.

At this stage the District Council generally supports the consultation document which does not raise any specific concerns at this time in relation to strategic cross border issues including significant development or infrastructure implications.

Key strategic matters

The local authorities have had on-going dialogue on cross-boundary planning issues over the course of many years, discussing a broad range of planning issues including strategic matters. Lichfield District Council welcomes positive dialogue with Stafford Borough Council through the Duty to Cooperate process as the SBC Local Plan progresses.

These include:

- Cannock Chase Special Area of Conservation (SAC)
- Cannock Chase Area of Outstanding Natural Beauty (AONB) and
- Gypsy and Traveller accommodation provision.

These discussions have informed the development of emerging plans (including the SBC Preferred Options and the LDC LP2040 Submission document, and other related documents). In terms of the consistency of planning policy and proposals across common boundaries LDC has no significant concerns regarding the Preferred Options document.



Development Strategy & Climate Change response

The SBC strategy is to actively mitigate for climate change including solar and wind proposals. This has parallels with the LDC approach.

Housing provision, distribution and location

SBC is not within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). As such it is noted that there are no specific housing related issues between the authorities.

- SBC makes provision of 535 new homes per year totalling 10,700 over the Plan period. However, 2,000 new homes are identified as a contribution to meet unmet needs of other authorities in the region.
- SBC housing distribution has a focus on Stafford (59%), Stone (7%), Meecebrook Garden Community (24%), Larger settlements (4%) and smaller settlements / other rural areas (1% each) and 6% through windfall developments.
- The focus of new development is at Stafford, Stone, a new Garden Community called Meecebrook, and larger settlements in rural areas.
- 3,000 new homes at Meecebrook and 1,500 at the existing settlements. 6,200 approved / built including currently allocated Strategic Development Locations at Stafford Town.
- The urban regeneration in North Staffordshire is to be taken into account by SBC.
- There are no Green Belt amendments

Transportation

Lichfield District Council and Stafford Borough Council are committed to continue working together in partnership, with the aim of ensuring the necessary transport and highways improvements to support sustainable growth are achieved where relevant to the geographical area. Both parties will keep each other fully informed of any changes to highways improvements and will continue to liaise on this matter where appropriate.

The SBC strategy is in accordance with Staffordshire County Council's Local Transport Plan, reflecting the county wide approach to be expected. Sustainable transport infrastructure is to be focused on Meecebrook with new developments to reduce commuting patterns.

Gypsies and travellers

LDC wrote previously to neighbouring authorities, including SBC in March 2017 as part of the Local Plan Site Allocations work to ascertain if authorities were able to assist Lichfield District Council in meeting the unmet need in relation to accommodation for Gypsies and Travellers. SBC confirmed they were unable to assist in meeting this unmet need, but they have identified two new sites for Gypsy and Travellers in their own Borough.

Infrastructure

LDC and SBC are committed to continue working together in partnership, with the aim of ensuring the necessary infrastructure improvements to support sustainable growth across the relevant geographical area.

Protecting the natural and historic environment



No new development is proposed by SBC to be located in areas identified with flood risk implications. Natural and heritage assets / designations are also protected, conserved and enhanced. There are no significant concerns regarding Local Plan implications.

However, particular issues of relevance to LDC are:

- In the Cannock Chase Special Area of Conservation (SAC) where the authorities work together on the delivery of evidence base and mitigation plan, there are no cross-border concerns between authorities on this matter.
- Both LDC and SBC acknowledge the need for both authorities to continue working collaboratively with Natural England and other partners in relation to visitor impacts from the residents of new development within 15 km of the SAC, and in relation to air quality impacts from new development and associated commuting.
- The Cannock Chase Area of Outstanding Natural Beauty, and the Trent and Mersey Canal Conservation Area, but there are no adverse issues relating to these areas.

Level and distribution of employment land / retail provision

- SBC employment provision is for at least 80 hectares over the Plan period with two proposed sites at Stafford north and Ladfordfields, and 108ha of existing commitments. Major Developed Sites in the Green Belt continue for employment use.
- SBC does not have proposals for significant retail development. Stafford and Stone town centres are identified with Eccleshall as a local centre. No cross-border implications for retail with Lichfield are identified.

In summary:

- Proposals in the previous Issues and Options version of the Stafford Borough Local Plan have been revised and the only significant concern raised by Lichfield District Council then was regarding a new large housing development and potential impact on the Cannock Chase SAC, in Hixon. However, this has not been brought forward into the Preferred Options.
- Housing provision and distribution within the SBC Preferred Options is not considered to impact on the strategic or locational pattern of provision in Lichfield District.
- No changes to the Green Belt in the Stafford area are proposed.
- Proposals in the Preferred Options are likely to strengthen the protection of the Cannock Chase SAC, and current cross border working is investigating mitigation for the area from development in the wider area.
- It is noted that SBC has made appropriate provision in the document for gypsies and travellers in its own area.

Lichfield District Council welcomes positive dialogue with Stafford Borough Council through the Duty to Cooperate process as the Stafford Borough Council Local Plan progresses.



Yours faithfully



Lucy Robinson
Policy and Strategy Manager



www.lichfielddc.gov.uk



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[MyStaffs App](#)

From: Gail Collins [REDACTED]
Sent: 12 December 2022 11:18
To: [REDACTED] Strategic Planning Consultations
Cc: [REDACTED]
Subject: 21012 Revised Reps by MPFT to SBC Preferred Options consultation
Attachments: 21012 Revised reps by MPFT to Preferred Options Consultation 12th December 2022.docx; 21012 SUBMITTED Revised Final Reps to SBC Preferred Options Consultation GC 12 Dec 2022.pdf; 21012 Revised reps by MPFT to Preferred Options Consultation 12th December 2022.pdf

Dear [REDACTED]

Please find attached the revised comments of the Midlands Partnership NHS Foundation Trust (MPFT) which should be substituted for those submitted on 11th December 2022. I attach the completed consultation form (in word and PDF) and also attached a PDF of the comments. Please acknowledge receipt. Many thanks for your help.

Kind regards,

Gail Collins BSc(Hons) DipTP MRTPI DMS
Director

[REDACTED]

Address

[REDACTED]

Opening Hours

[REDACTED]



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Planning | Architecture | Master Planning

Our Ref: 21012 SUBMITTED Revised Final Reps to SBC PREFERRED OPTIONS CONSULTATION GC 12 Dec 2022

12th December 2022

Stafford Borough Council Preferred Options: Formal Representations on behalf of Midlands Partnership NHS Foundation Trust

Design and Infrastructure Policies

“SBC 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? No.

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.”

MPFT response to Policy 37:

The Midlands NHS Foundation Trust welcome the opportunity to participate in the Preferred Options consultation. We also welcome and support the high degree of priority given to the provision of health infrastructure and to healthy living and would anticipate this will continue as part of the review. A good working relationship between our organisations should be seen as integral to the operation of the Duty to Co-operate.

The Midlands Partnership NHS Foundation Trust (MPFT) was formed on 1 June 2018 following a merger between South Staffordshire and Shropshire Healthcare NHS Foundation Trust and Staffordshire and Stoke on Trent Partnership NHS Trust. It provides mental health, learning disability, and some physical care services across Staffordshire, Stoke-on-Trent and Shropshire.



Population growth in Stafford Borough will have profound implications for future service requirements. The NHS locally fully appreciates this has implications and obligations for them, as well as the Council and other service providers. A recent reorganisation has resulted in a partnership between the Council and Social Care providers. This will mean that there will be shared responsibility between the Councils and the NHS Trusts to ensure sufficient infrastructure is available, accessible, and maintained with sufficient capacity to serve the whole community.

Significant growth in population and housing is envisaged in plans across the West Midlands and it is important that NHS services are seen as integral to the supporting infrastructure necessary to support the increasing population. This means infrastructure across the full range of health services and not to be confined to support for primary care infrastructure alone. As discussed, provision of healthcare through development plans can often be limited to frontline first call services such as GPs, however conditions that are first identified by GPs are often subsequently passed on to other healthcare services such as the mental health services operated by the MPFT in Stafford Borough and surrounding areas, which also require appropriate funding. The services of the MPFT are already over capacity and there is increased demand in all its services.

It is noted that the population of Stafford Borough is forecast to increase by more than 20,000 people between 2020 until 2040, which represents a 15% increase in population.

To this effect, the MPFT is seeking to ensure that as the local plan is reviewed that the supporting evidence base and emerging policies enable the growth in demand for NHS services to be reflected so that necessary funding in support of service improvement can be sought. The MPFT would then hope that the policies in the plan are clear that resources for health service improvements to meet the needs of the growing population would be set out in supporting Viability Reports, Infrastructure Delivery Plans and sought as part of S106 and CIL.

Policy 37 of the Preferred Options is supported by MPFT as it sets out the requirement for the provision of necessary infrastructure to support new development. 'Health' is identified as an element of infrastructure in the justification to Policy 37. Paragraph 37.2 states that "In this policy 'Infrastructure' includes (without limitation) education, health, transport, flood and water management, green infrastructure and public realm and their ongoing maintenance, biodiversity mitigation and digital infrastructure.". Therefore, the necessary policy 'hooks' exist to allow for health infrastructure through developer contributions. However, it is considered that the list of related infrastructure should be included within Policy 37 rather than solely in its justification. It is also important that infrastructure implications are taken into account as part of cross boundary discussions over the location of new growth. As discussed, the MPFT services overspill to neighbouring boroughs and counties.

The referenced mechanism for delivery set out in Policy 37 is to use planning obligations to deliver the necessary infrastructure. MPFT consider this to be an appropriate mechanism on larger sites/ allocations but is concerned that Policy 37 does not account for windfall development and the cumulative impact of smaller development. It is noted that 13.5% of the new allocations/ supply sources identified in the Preferred Options under Policy 1 and the table 'Broad spatial distribution of housing' are proposed from windfall sites (with 6% of new housing overall coming from windfalls). It is respectfully requested that the Council re-starts work on its CIL charging schedule. Without policy recognition and a delivery mechanism for

the provision of health infrastructure funding needs arising from smaller windfall development and a consideration of the cumulative impact of development, there will be under provision of necessary health infrastructure. It is vital that health infrastructure is included on the CIL Regulation 123 list.

It is noted that paragraph 37.6 states: “In accordance with national policy, the Infrastructure Delivery Plan (IDP) sits alongside this plan [the Stafford Borough Council Preferred Options] and identifies the infrastructure needed to support delivery of the plan. As detailed in the IDP, engagement with infrastructure providers was undertaken during the preparation of this plan to establish infrastructure requirements. It will be important for developers to work with the council and infrastructure providers to understand the infrastructure needs of their developments and routes to delivering the necessary infrastructure.”

Paragraph 6.15 of the ‘Infrastructure Delivery Plan (Preferred Options Stage)’ October 2022 (IDP) states: “At the time of writing this IDP a response had not be provided from health service providers. This document will be updated in due course once information has been received.” and under ‘Engagement with Infrastructure Providers’ it is stated that: “Further engagement will be ongoing throughout the Preferred Options consultation process until the Plan is ready for submission.”

The MPFT are appreciative that meaningful dialogue with the Council has now commenced (December 2022) on the matter of developer contributions towards its necessary infrastructure. As acknowledged, it is important that the costs of support for providing health infrastructure are included in the Viability Report which supports the Council’s Preferred Options document – however, it is clear from the Stafford Borough Council Local Plan and CIL Viability Assessment Report Stafford Borough Council September 2022, and from the ‘Infrastructure Delivery Plan (Preferred Options Stage)’ (October 2022) that this has not occurred for the reasons we have discussed.

The MPFT welcome the opportunity to input into the IDP process but note that without this previous engagement there may have been incorrect assumptions made concerning the healthcare infrastructure requirements arising from the level of forecast growth.

In addition, the MPFT consider the timescale of review of the IDP should be more frequent than once every 5 years as proposed. The IDP review should be an annual process to reflect annual demand changes. MPFT need to be flexible to changing circumstances and the availability of funding streams.

The MPFT look forward to continued liaison with the Council during the plan preparation process and then beyond into the implementation phase to enhance health service provision alongside the growth that will be taking place.

Evidence Base

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

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

MPFT response to Question 15:

MPFT have the following comments to make on the evidence base informing the Preferred Options.

The Stafford Borough Council Economic and Housing Development Needs Assessment (EHDNA), January 2020 (produced by Lichfields) at paragraph 24 states:

“In the Borough specifically it is projected that between 2019 and 2039:

- The number of adults (18 to 64 years) with learning disabilities will decrease by 1%;
- The number of adults with mental health conditions will decrease by 5%”

It is noted that the source of these figures was Staffordshire County Council's 'Population Demographics and Adult Social Care Needs' published in February 2019, prior to the Covid-19 pandemic. It is well understood that there is a growing need for such services due to the impact of lockdowns and the Covid-19 pandemic, particularly on mental health. The figures used are based on 2016 population projections. It is considered that up-to-date information relating to mental health conditions, learning disabilities etc should be sought.

Detailed data around the growing prevalence of mental health and learning disabilities and the impact on MPFT services can be provided, however due to the timescales of response, below is a summary. Within Stafford Borough there are acute Mental Health (including psychosis, older adult, dementia, postpartum psychosis and depression, eating disorders) and Learning Disability inpatient wards. The data below refers to more general prevalence of mental health disorders which have seen an increase in recent years which has been exacerbated by the pandemic, however, as Public Health England note, it is estimated that 50% of patients attending GPs with depressive disorders do not have their symptoms recognised. In general:

- An estimated 1 in 6 adults have experienced a 'common mental disorder' like depression or anxiety in the past week.
- 2.0 million adults and 0.8 million children accessed NHS mental health, learning disability and autism services in 2020/21.
- Around 1 in 6 children aged 6 to 16 had at least one probable mental health problem in 2021, up from 1 in 9 in 2017.

(Source data is from the 2021 Parliamentary 'Mental Health Statistics' report by Carl Baker)

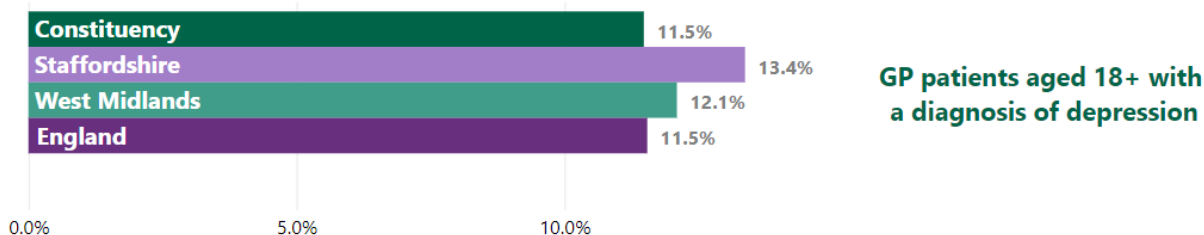
Stafford Borough Constituency data: health conditions Data Dashboard, published Tuesday, 27th April 2021 - [Constituency data: health conditions \(parliament.uk\)](https://www.parliament.uk/constituencies/stafford-borough/health-conditions) The data sets below demonstrate that Stafford is not an outlier against national data in terms of having

abnormally low prevalence and contradicts assertions in the Preferred Options evidence that mental health need is declining in the borough. In general across the country need has continued to increase, the pandemic saw an above trend spike with a more standard trajectory now in place, although a backlog of demand for services is still being addressed. Most telling is that 7 out of the 12 small areas of Stafford are reporting higher than the England average for prevalence of depression.

Stafford ▼ **Depression** ▼

Estimated prevalence in 2019/20 compared with other areas:

Definition

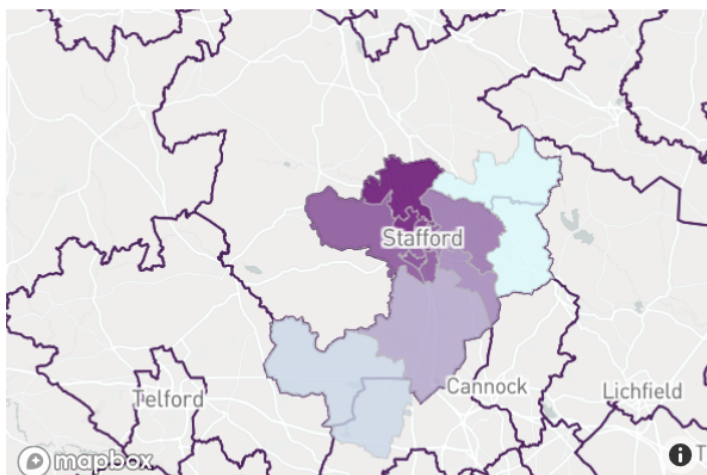


These figures are **estimates for 2019/20** based on GP practice data published by [NHS Digital](#). Please see the notes and links below for full source data, information on how the estimates were calculated, and links to the code used to produce them.

Estimates for small areas in and around the chosen constituency, 2019/20

MSOA name	Estimate
Stafford Common & Great Brid...	13.8%
Doxey & Holmcroft	13.6%
Central Stafford	13.1%
Highfields & Burton Manor	12.5%
Stafford North East	12.1%
Rowley & Derrington	12.1%
Mosspit & Silkmore Lane	12.1%
Littleworth & Hopton	11.2%
Weeping Cross & Brocton	10.6%
Penkridge & Acton Trussell	9.8%
Brewood & Wheaton Aston	8.5%
Weston & Haywood	7.7%

Darker shading indicates higher estimated prevalence

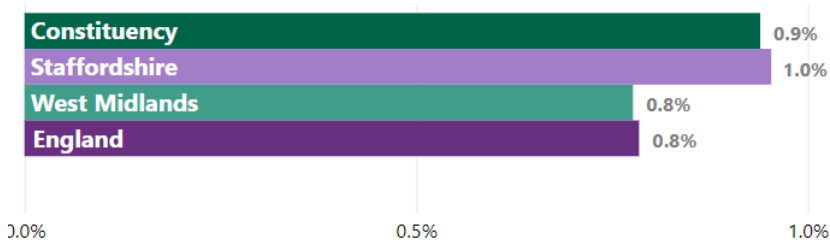


Stafford ▼

Dementia ▼

Estimated prevalence in 2019/20 compared with other areas:

Definition



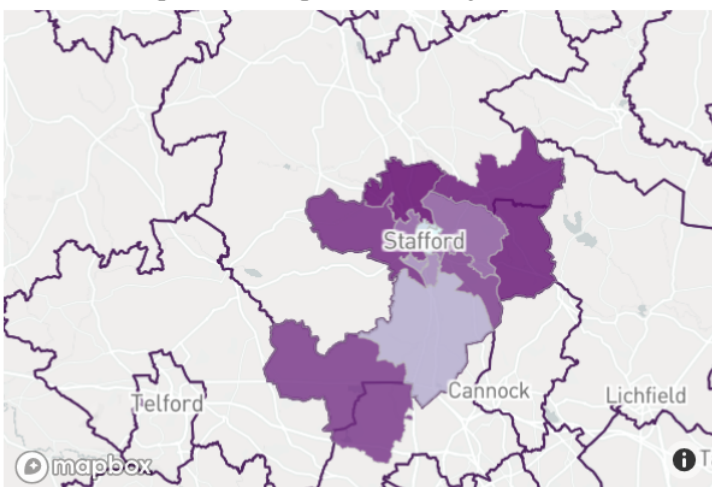
GP patients of all ages diagnosed with dementia. Note that around a third of dementia cases are undiagnosed.

These figures are **estimates for 2019/20** based on GP practice data published by [NHS Digital](#). Please see the notes and links below for full source data, information on how the estimates were calculated, and links to the code used to produce them.

Estimates for small areas in and around the chosen constituency, 2019/20

MSOA name	Estimate
Stafford Common & Great Brid...	1.2%
Weston & Haywood	1.2%
Rowley & Derrington	1.1%
Brewood & Wheaton Aston	1.1%
Weeping Cross & Brocton	1.1%
Littleworth & Hopton	1.0%
Doxey & Holmcroft	1.0%
Mosspit & Silkmore Lane	0.9%
Highfields & Burton Manor	0.9%
Penkridge & Acton Trussell	0.8%
Central Stafford	0.6%
Stafford North East	0.6%

Darkener shading indicates higher estimated prevalence

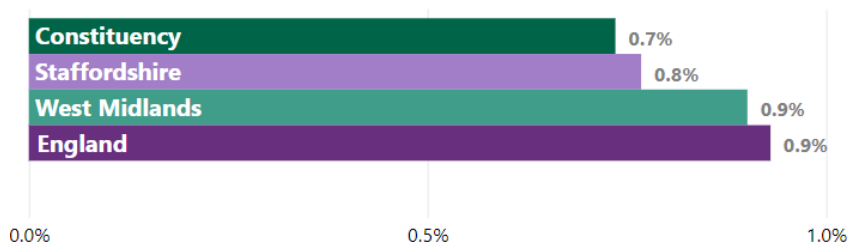


Stafford ▾

Schizophrenia, bipolar disorder & p... ▾

Estimated prevalence in 2019/20 compared with other areas:

Definition



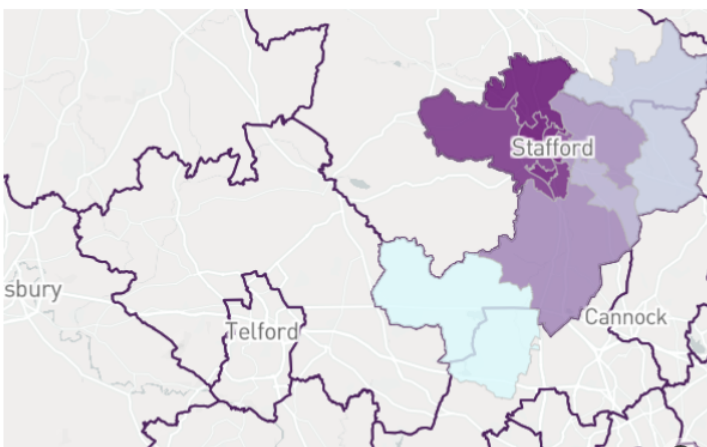
GP patients of all ages diagnosed with schizophrenia, bipolar disorder and other psychoses

These figures are **estimates for 2019/20** based on GP practice data published by [NHS Digital](#). Please see the notes and links below for full source data, information on how the estimates were calculated, and links to the code used to produce them.

Estimates for small areas in and around the chosen constituency, 2019/20

MSOA name	Estimate
Doxey & Holmcroft	0.9%
Stafford Common & Great Brid...	0.9%
Central Stafford	0.9%
Highfields & Burton Manor	0.9%
Mossnit & Silkmore Lane	0.8%
Rowley & Derrington	0.8%
Stafford North East	0.8%
Penkridge & Acton Trussell	0.7%
Littleworth & Hopton	0.6%
Weeping Cross & Brocton	0.6%
Weston & Haywood	0.5%
Brewood & Wheaton Aston	0.4%

Darker shading indicates higher estimated prevalence

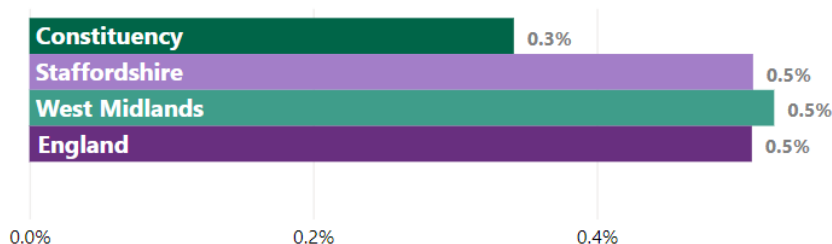


Stafford

Learning disabilities

Estimated prevalence in 2019/20 compared with other areas:

Definition



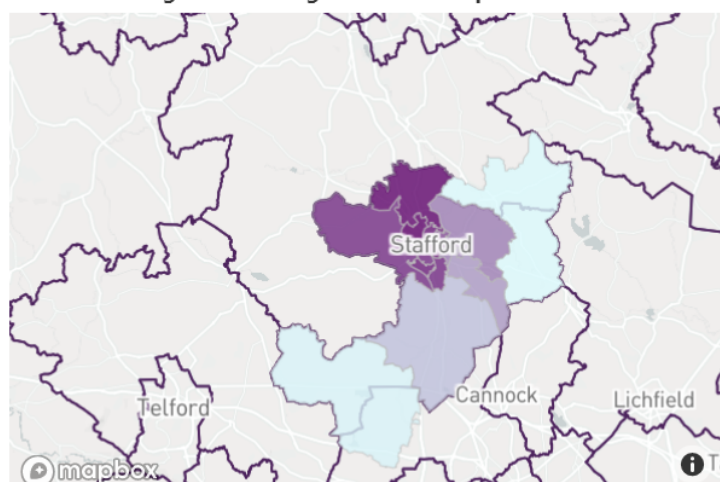
**GP patients of all ages
with learning disabilities**

These figures are **estimates for 2019/20** based on GP practice data published by [NHS Digital](#). Please see the notes and links below for full source data, information on how the estimates were calculated, and links to the code used to produce them.

Estimates for small areas in and around the chosen constituency, 2019/20

MSOA name	Estimate
Doxey & Holmcroft	0.4%
Stafford Common & Great Brid...	0.4%
Central Stafford	0.4%
Highfields & Burton Manor	0.4%
Mossnit & Silkmore Lane	0.4%
Rowley & Derrington	0.4%
Stafford North East	0.4%
Littleworth & Hopton	0.3%
Weeping Cross & Brocton	0.3%
Penkridge & Acton Trussell	0.2%
Brewood & Wheaton Aston	0.2%
Weston & Haywood	0.2%

Darkener shading indicates higher estimated prevalence



The Stafford Borough Strategic Development Site Options Reasonable Alternatives Study December 2019 (produced by AECOM) sets out the 'healthcare' requirements for various sizes of settlements. As set out in the MPFT response to the Preferred Options under the 'Design and Infrastructure Policies', the healthcare provision needs arising from Urban Extension of smaller settlements (Table 9 of that report) or Co-dependent/Autonomous larger settlements (Table 10) is not limited to Primary Care and Hospitals.

The Sustainability Appraisal (SA) of the Stafford Borough Local Plan 2020-2040 Interim Report October 2022 provides a consideration of health facilities but again omits reference to non-primary healthcare facilities as provided by MPFT, although acknowledging that the Council did request the CCG to comment in detail, e.g. under 9.6 'Communities' and the 'Commentary on the spatial strategy', the Sustainability Appraisal states:

“...9.6.3 Health facilities are a further consideration. There is a need for the local NHS Clinical Commissioning Group (CCG) to comment in detail, but Meecebrook would certainly be of a scale to warrant delivery of a new facility, albeit there are existing facilities at Eccleshall and Stone.”

This is also repeated further on in that document, namely (Appendix II: The SA scope) “Health facilities are a further consideration, but there is a need for the local NHS Clinical Commissioning Group (CCG) to comment in detail. Gnosall benefits from an existing GP surgery (it is not known if there are any capacity issues), whilst Meecebrook would certainly be of a scale to warrant delivery of a new facility, albeit there are existing facilities at Eccleshall and Stone. With regards to Beacon Hill, the site would be well-linked to the Stafford urban area, including the town centre, so there is little to suggest that it would be an appropriate location for a new health facility. With regards to Hixon Airfield, there could well be merit to exploring the potential for a GP surgery to serve Hixon, and it is noted that the high level concept masterplan received from the site promoter does propose to make a significant area of land (5.6 ha) available for retail and community uses; however, again, there would be a need to be guided by the local CCG.”

Again, the Sustainability Appraisal does not take care of other healthcare infrastructure such as that operated by MPFT.

The CIL Viability Report Stafford Borough Council (September 2022) states the following: ‘We have included the existing and proposed policy costs in our appraisals. These assumptions are set out in the Strategic Site Assumptions at Appendix 6 (which are based on stakeholder consultation).’ It is unclear what assumptions have been made, as the MPFT has not previously been consulted.

From: McCabe, Jodie Mrs (DIO Estates-AD Sr TownPlanner 2) [REDACTED]
Sent: 08 December 2022 10:05
To: SPP Consultations
Cc: [REDACTED]
Subject: Stafford Local Plan Preferred Options - MOD Response
Attachments: 20221208-Stafford LP MOD Reponse-O.pdf

Dear Sir or Madam

Please find attached a response from the Defence Infrastructure Organisation, on behalf of the Ministry of Defence, to the consultation on the Preferred Options of the Stafford Local Plan review.

I would be grateful if you could please confirm receipt of this email.

Yours faithfully,
Jodie

Jodie McCabe | BSc (Hons) MA MRTPI
Senior Town Planner | Estates - Town Planning Team

[REDACTED]

Mobile: [REDACTED]
Email: [REDACTED]

[REDACTED]

[REDACTED]



**Defence
Infrastructure
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Ministry of Defence



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

Sent via email to SPPconsultations@staffordbc.gov.uk

8 December 2022

Dear Sir or Madam

STAFFORD BOROUGH LOCAL PLAN 2020-2040 – PREFERRED OPTIONS CONSULTATION

1. The Defence Infrastructure Organisation (DIO) on behalf of the Ministry of Defence (MOD) welcomes the opportunity to comment on the above document. The MOD has two sites within Stafford Borough, MOD Stafford and Swynnerton Training Area so it is keen to ensure that Defence sites and activities are appropriately protected. The MOD has reviewed the consultation documentation and would like to make the following comments.

Stafford Settlement Strategy (Page 27)

2. The MOD is disappointed that there is no reference within the strategy to support for the continued operation, and presence, of MOD Stafford.
3. MOD Stafford has been recognised as playing an important part of the Defence Estate Optimisation Programme (DEOP) which was mobilised in order to deliver a smaller but better defence estate to support military capability. The site has been identified as a 'Receiver Site' within DEOP which means that it will have an important role to play in the future optimisation of the defence estate and there is an enduring, long-term requirement for the site. The requirement for additional development to meet defence requirements at MOD Stafford arising as a result of DEOP is in the process of being finalised but this is expected to see further intensification of this existing, operational defence site.
4. Paragraph 97 of the National Planning Policy Framework (NPPF) sets out a requirement for planning policies to take into account defence requirements by recognising and supporting development required for operational defence and security purposes. In recognition of this, MOD would like to see in-principle support for development at MOD Stafford set out within the Plan, either within the settlement strategy for Stafford, or within a separate defence-specific policy.

Policy 3 – Development in the Open Countryside – General Principles

5. The MOD has significant concern with this policy. The current wording states that only development in 11 specific categories will be supported in the open countryside and the explanatory text within paragraph 3.1 explicitly states that other types of development will not be supported.
6. Whilst the MOD understands the purpose behind the policy, given that none of the 11 categories would apply to development required for national defence purposes, it is natural to conclude from the policy as currently drafted, that the Council would not support future development at Swynnerton Training Area (an operational training area in the Borough), or satellite sites associated with MOD Stafford. This goes completely against the requirements of Paragraph 97 of the NPPF which states: *“Planning policies and decisions should promote public safety and take into account wider security and defence requirements by: ... b) recognising and supporting development required for operational defence and security purposes...”*
7. To address this concern, the MOD would like to see an additional category of development added to this policy so that wording along the lines of *“development required to support defence”* is included within the policy. Alternatively, MOD would like to see the provision of a defence-specific policy which would provide in-principle support to defence related development. The MOD would be happy to provide some examples of such policies being implemented elsewhere to assist the Council.

Policy 4 – Climate Change Development Requirements

8. The MOD would like to see some clarification to this policy as currently written it has the potential to be interpreted in a way that is overly onerous.
9. Within the context of the net zero operational energy: non-residential section (although this also applies to the residential section), the requirements set out in C1 and C3 are assumed to apply only to the site that falls within the red-line boundary of the development that is proposed. However, it could equally be construed that *“the site”* applies to a larger site that the proposed development site is a part of. For example, if major development was brought forward at MOD Stafford, it would not be appropriate to require the whole of the establishment to have no on-site fossil fuel combustion as a result of the development. The policy would benefit from clarification with respect to this point.
10. Within Part C of this policy, the MOD does support the reference to alternative compliance routes within the context of BREEAM accreditation as this would enable discussions with the Council to be had on the use of the Defence Related Environmental Assessment Methodology (DREAM) assessment tool which has been devised specifically for defence buildings. Further information on this methodology can be found at www.dreamassess.com.

Policy 7 – Meecebrook Site Allocation

11. The proposed Meecebrook site falls adjacent to, and immediately south of, Swynnerton Training Area. This site is an operational Defence training area of national importance and therefore it is vital that proposals within the plan do not impact adversely on the ability of the site to continue to function and operate in the national Defence interest. The fact that there is an operational training area immediately adjacent to the proposed allocation is not currently recognised within the plan.
12. The MOD would like to draw the Council’s attention to Paragraph 97 of the National Planning Policy Framework (NPPF) that requires planning policies to:

“promote public safety and take into account wider security and defence requirements by:... b)...ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.”

13. The MOD does have some concerns over the allocation at Meecebrook and its potential to impact adversely on the ongoing operation of the training area. These concerns are set out below and the MOD would welcome further discussion with the Council to explore the issues in further detail and discuss options for mitigation.

Swynnerton Training Area

14. Swynnerton Training Area was an ordnance factory producing, packing and storing munitions, originally during the Second World War. Today it consists of a Camp and Training Area covering 228 hectares. The site is ring-fenced, has no public access and has no bylaws affecting it.
15. The site attracts units from a large, dispersed area stretching from South Yorkshire down to Oxford and Bristol, west into South Wales and east into Lincolnshire. The Training Area can accommodate up to 800 troops from different units, training simultaneously, over short to medium periods.
16. A variety of military units from all three Services and their Reserves and Cadets are eligible to train at Swynnerton. The site offers a broad range of training opportunities and activities and is used for all levels of Command Post exercises, and by all types of 'dismounted' (i.e. on foot) infantry, up to company size. Activities at the site include live and dry firing and the site also provides safe areas for personnel to undertake explosive training. Large logistic units requiring road and track circuits use its hard standing, woods and buildings in which to establish and disperse, Royal Engineer units perform practical work projects and the site is also used for watermanship and driver training, and by the Royal Marines and Royal Air Force.
17. The site is also utilised for helicopter training and has a number of designated landing sites located throughout the training area. The site is utilised by No.1 Flying Training School, based at RAF Shawbury to provide basic and advanced helicopter training for the Royal Navy, Army and Royal Air Force. These exercises can include low level flying and night flying in hours of darkness as well as flying during the day. They can also include overflight of the site from any direction depending on the training requirements and meteorological conditions of the day. Helicopter activity from other units also takes place at the site as and when required.
18. Training can take place over 365 days of the year. This includes weekends and bank holidays where specific training requirements arise. Furthermore, activities can cover the whole of a 24-hour period.

Areas of Concern

- Highways and Access: The increase in built up development to the south of the Training Area has the potential to create issues in relation to future complaints from residents caused by the movement of military vehicles. Such movement can involve convoys of military vehicles containing large and small type vehicles and also transporters of military equipment. The continued use of Swynnerton Road to the south of Swynnerton Training Area as a key route for the movement of military vehicles to and from the training area is of key importance, particularly as Swynnerton village to the north of the site has a restriction on the movement of such vehicles. As part of the design of Meecebrook, MOD would like assurances that no restrictions will be placed on the movement of military vehicles through the site and MOD would like to be engaged with work on future masterplanning and design to ensure that this issue is taken into account.

- **Noise:** The potential for noise complaints relating to defence activities is a key area of concern for MOD across its estate, particularly within the context of noise complaints arising from third party development close to MOD sites. The MOD is dealing with an increasing number of cases where residential and other noise-sensitive development is being proposed near to 'noisy' defence sites such as airfields, ranges and training areas. New development close to such sites leads to the potential for noise complaints which in turn can place pressure on MOD to amend operations / the use of its sites, or face the requirement for significant payouts to claimants. The development of a new settlement immediately to the south of an operational training area represents a huge increase in the number of sensitive receptors in the vicinity of Swynnerton Training Area. Given the type of activities that take place on the training area there is scope for a significant increase in the number of noise complaints received, which would have the potential to place pressure on MOD to alter its activities, which in turn would impact adversely on the operational effectiveness of the training area.

MOD would like to draw the Council's attention to Paragraph 174 of the NPPF which requires planning policies to prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of noise pollution. In addition, Paragraph 97 requires planning policies to take into account defence requirements and ensure that operational sites are not affected adversely by the impact of other development in the area. National Planning Practice Guidance on Noise highlights that the issue of noise needs to be considered when development would be sensitive to the prevailing acoustic environment and that plan making needs to take account of the acoustic environment and whether adverse effects are likely to occur.

Taking the above into account, the issue of noise needs to be considered early on in the development of proposals for Meecebrook, including appropriate noise monitoring and survey work. In accordance with the Agent of Change Principle (NPPF Paragraph 187), it is the responsibility of the developer(s) of Meecebrook to protect future occupants from the noise impact of defence activity. In order to ensure that such work fully takes into account noise arising from defence related activity, MOD input into the methodology and timing of any noise surveys will be required. Furthermore, engagement with MOD will be required in relation to any proposed noise mitigation measures and MOD would like to have input into any emerging masterplan and the proposed Meecebrook Framework Masterplan Supplementary Planning Document in order to ensure that noise issues are appropriately taken into account.

- **Security:** As already established, the Meecebrook proposals are immediately adjacent to Swynnerton Training Area and therefore MOD has concerns that such close proximity could create the potential for increased observation of, or attempts at unauthorised access to, the training area. MOD would like to input into the emerging masterplan and the proposed Meecebrook Framework Masterplan Supplementary Planning Document to ensure that only appropriate development is located close to the site boundary, and that appropriate landscaping schemes are developed.
- **New Railway Station:** The MOD has concerns that depending on its final location, the new station could create the potential for congestion close to the main entrance to Swynnerton Training Area. The MOD would like assurances from the Council that appropriate work on highways and parking provision will be undertaken to ensure that the potential for congestion is removed.
- **Wildlife Corridor:** Whilst it is appreciated that the concept masterplan has not been published as part of the local plan consultation, it is noted however that it has been published on the Council's website. The concept masterplan shows a wildlife corridor extending into land occupied by Swynnerton Training Area. Given that Swynnerton Training Area is not within the red line boundary of Meecebrook, there should be no policy or other restrictions placed on the MOD as a result of the identification of this

corridor. Furthermore, within this area on the concept masterplan a number of pedestrian routes are shown on land that is within MOD ownership and part of Swynnerton Training Area. These should be removed from any masterplan going forward as there is no public access to the training area site.

Policy 8 – Masterplanning and Design at Meecebrook

19. Given that there is an operational defence training area immediately adjacent to the Meecebrook site, coupled with the issues identified under Policy 7 above, in order to ensure that the requirements of Paragraph 97 of the NPPF are met, MOD would like to be engaged on the masterplanning and design of the new settlement. Furthermore, MOD would like to be included within Part B of this policy to ensure that neighbourhood masterplans and design codes are prepared in collaboration with MOD and appropriately take defence interests into account.

Policy 9 – North of Stafford

20. It is noted that this is a strategic site allocation which is allocated within the current, adopted local plan for Stafford Borough. It is understood that outline planning permission was granted in May 2022 for a mixed use development including 2,000 dwellings (planning application reference 15/23050/OUT). It is assumed that reserved matters will come forward for the new site in accordance with the outline permission. However, should that permission not be implemented, this policy would supersede the current adopted policy and therefore be the relevant policy to be taken into consideration for any other outline applications submitted for the site. Therefore this response covers both scenarios.
21. The eastern extent of the allocation falls immediately adjacent to MOD Stafford. The MOD has concerns with the potential for future residential development immediately adjacent to the boundary of MOD Stafford, which could have security implications. Given that Paragraph 97 of the NPPF states that planning policies should ensure that operational defence sites are not affected adversely by the impact of other development, the MOD would like to see reference within the supporting text to the fact that there is an operational defence sites adjacent to the strategic allocation and that, in accordance with NPPF Paragraph 97, the design of the proposals should ensure that MOD Stafford is not adversely affected. MOD would like to see the policy encourage applicants to engage with MOD in the development of planning applications to discuss this point.
22. The issue of noise, as highlighted above with respect to Meecebrook, is also of relevance here. MOD Stafford has two helicopter landing sites (HLS), one is a refuelling facility for rotary aircraft up to CH-47 Chinook, and the other is utilised for training purposes and is frequently used by heavy lifting rotary aircraft. Both HLS are in close proximity to the eastern extent of the allocation. It should also be noted that MOD Stafford has a 25m range that is used weekly. Any noise implications of the proposals should be addressed as part of any outline or full planning application for the site.

Policy 30 – Gypsy and Traveller Accommodation

23. The policy includes proposals for at least 15 pitches on land near Hopton. This site is immediately adjacent to 2 Site which is a satellite site within the ownership of the MOD, parented by MOD Stafford. Similar to the concerns raised under Policy 9, this proposal has the potential to allow future residential accommodation and associated ancillary development immediately adjacent to the boundary of MOD land, which could have security implications.
24. The MOD already has concerns about how existing development adjacent to 2 Site has encroached up to, and in some areas over the top of, the perimeter fence of 2 Site. This serves

to increase the potential for security breaches. The addition of further development in this location will only compound the situation further. Given that Paragraph 97 of the NPPF states that planning policies should ensure that operational defence sites are not affected adversely by the impact of other development, the MOD would like to see the site boundary moved away from the perimeter fence at 2 Site, or alternatively explicit reference within the policy to a need to create an appropriate buffer, in discussion with the MOD, between the allocated site and the outer perimeter fence at 2 site to ensure that future development and associated ancillary uses do not encroach on 2 Site.

Policy 50 – Pollution

25. As already highlighted above, the potential for noise complaints relating to defence activities is a key area of concern for MOD across its estate, particularly within the context of noise complaints arising from third party development close to MOD sites. The MOD is dealing with an increasing number of cases where residential and other noise-sensitive development is being proposed near to 'noisy' defence sites such as airfields, ranges and training areas. New development close to such sites leads to the potential for noise complaints which in turn can place pressure on MOD to amend operations / the use of its sites or face the requirement for significant payouts to claimants.
26. Noise assessments that accompany planning applications can often fail to acknowledge the presence of defence sites, can inadequately take into account noise arising from such sites or fail to assess the particular considerations relating to such noise, such as helicopter activity or noise from the use of ranges etc. The MOD would like to see a reference within the policy supporting text along the lines of:

“Where proposed development has the potential to be affected by defence related activities, any noise assessment should be planned and carried out following engagement with the Ministry of Defence.”

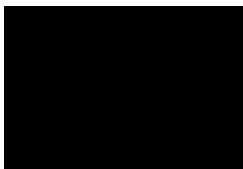
General considerations - MOD Safeguarding

27. The DIO Safeguarding Team represents the Ministry of Defence (MOD) as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate.
28. Paragraph 97 of the NPPF requires that planning policies and decisions should take into account defence requirements by *‘ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.’* To this end MOD may be involved in the planning system both as a statutory and non-statutory consultee. Statutory consultation occurs as a result of the provisions of the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002 (DfT/ODPM Circular 01/2003) and the location data and criteria set out on safeguarding maps issued by Department for Levelling Up, Housing and Communities (DLUHC) in accordance with the provisions of that Direction.
29. The area covered by the Stafford Local Plan 2020-2040 is partially washed over by safeguarding zones associated with Ternhill and Chetwynd Airfields, and drawn to preserve the operation and capability of a technical asset which contributes to air traffic management known as Central WAM network. Plans showing these statutory safeguarding zones have been provided to Stafford Borough Council in accordance with the requirements of the Direction, the key of each of those plans provides details of the criteria associated with each of the designated zones that trigger the requirement for MOD to be consulted.

30. Where development falls outside designated safeguarding zones, the MOD may also have an interest, particularly where the development is of a type likely to have an impact on operational capability by virtue of scale, height, or physical properties. Examples of these types of development include renewable energy development such as the installation of wind turbine generators or solar photo voltaic panels, or any development that would exceed a height of 50m above ground level. Both tall (of or exceeding a height of 50m above ground level) structures and wind turbine development introduce physical obstacles to low flying aircraft. Solar PV development can compromise the operation of communications and other technical assets by introducing substantial areas of metal that degrade signals and, depending on the location of development, may produce glint and glare to the detriment of aviation safety. Wind turbines may impact on the operation of surveillance systems such as radar where the rotating motion of their blades can degrade and cause interference to the effective operation of these types of installations, potentially resulting in detriment to aviation safety and operational capability. This potential is recognised in the Government's online Planning Practice Guidance which contains, within the Renewable and Low Carbon Energy section, specific guidance that both developers and Local Planning Authorities should consult the MOD where a proposed turbine has a tip height of, or exceeding 11m, and/or has a rotor diameter of 2m or more.

I would welcome the opportunity for further discussion on the issues identified above. In the interim, should you require further information or clarification on any of the points raised, please do not hesitate to contact me.

Yours sincerely



Jodie McCabe BSc (Hons) MA MRTPI
Senior Town Planner, Estates

From: David Pyner [REDACTED]
Sent: 12 December 2022 11:18
To: Strategic Planning Consultations; planning SBC
Cc: [REDACTED]
Subject: Stafford Borough Local Plan 2020-2040 Preferred Options Stage Consultation
Attachments: Preferred Options 12_12_22 - Draft - For issue.pdf

Good Morning,

Please find a response to the Stafford Borough Local Plan 2020-2040 Preferred Options Stage Consultation, from National Highways

Regards
Dave

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[REDACTED]

Consider the environment. Please don't print this e-mail unless you really need to.



Our ref:
Your ref:

David Pyner
Assistant Spatial Planner
Midlands Operations Directorate

[REDACTED]
Stafford Borough Council
Civic Centre
Riverside
Stafford
ST16 3AQ



www.nationalhighways.co.uk

Via Email:
Strategicplanningconsultations@staffordbc.gov.uk

12 December 2022

Dear [REDACTED]

Stafford Borough Local Plan 2020-2040 - Preferred Options Consultation

National Highways welcomes the opportunity to comment on the Stafford Borough Local Plan 2020-2040 Preferred Options document. It is noted that this will cover the plan period 2020-2040 and will replace the previously adopted plan which covered the period 2011-2031.

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. With regards to this consultation, our principal interest is in safeguarding the M6 and A50, which form part of the SRN and route through Stafford Borough.

As part of this consultation, we have reviewed the Stafford Borough Local Plan 2020-2040 Preferred Options document and the Interactive Policies Map, which include the proposed housing and employment allocation sites and protected employment areas. We understand that this current consultation is the second stage of public consultation for the preparation of a new Stafford Local Plan.

To ensure that this plan is positively prepared and maximises delivery to meet development needs over the plan period, the plan identifies or allocates sufficient land for approximately 12,580 dwellings and 150 ha of employment land. We note that the housing target is partially offset by the number of completed dwellings in 2020-2022 which equates to 1,120 dwellings. This leaves a residual housing requirement of 11,460 dwellings over the plan period.

National Highways have reviewed the proposed housing and employment site allocations and express interest in those which have the potential to impact the operation and

integrity of the SRN. We note that two site allocations are likely to impact the M6, including a proposed housing site located at land at Ashflats (ref STAFMB03) allocated for 268 dwellings. It is noted that this proposed development does not reference the requirement for a Transport Statement or Transport Assessment which we consider should be included. Furthermore, given the proximity of this site to M6 J13 we suggest that a review of this junction is included within the Local Plan through the presentation of an appropriate transport evidence base.

There is a proposed employment site located at land to the north of Redhill (ref CRE02) allocated for 31.15 ha of employment development. It is also understood that a protected employment area is located adjacent to the M6 J14 and National Highways welcomes the inclusion of a Transport Assessment to assess the impact of this site on M6 J14.

We note the proposed inclusion of the Meecebrook Garden Village (Policy 7) as site allocation for 3000 homes during the Plan period. This new settlement proposed to include circa 15 hectares of land for employment uses (as defined in the glossary) within the plan period. It is understood that the Meecebrook site could benefit from HS2, in terms of access to a proposed new railway station. National Highway welcomes proposals which can significantly improve the sustainability of the site,. Furthermore, we understand that the possibility of an additional junction on the M6 motorway has been separately put forward; although this is only a preliminary concept at this stage, National Highways would draw attention to the updated DfT Circular regarding access to the SRN.

At present, we believe that these are proposed developments that could impact the SRN and would require Transport Statement/Assessments to be conducted. National Highways welcomes further involvement as these sites progress.

National Highways are aware of various Neighbourhood Plans in the area which we note have been sufficiently considered throughout Stafford Local Plan Preferred Options document. This approach is welcomed to ensure that future goals and aspirations are aligned with road infrastructure needs and more specifically to understand how this growth is likely to impact the SRN.

Given the above, National Highways has no further comments to provide at this time. We trust that the above is useful in the development of the Stafford Local Plan.

Please let me know if you have any queries.

Yours sincerely

David Pyner
Assistant Spatial Planner
Email: [REDACTED]

From: Preferred Options Consultation [REDACTED]
Sent: 12 December 2022 09:59
To: Strategic Planning Consultations
Subject: Preferred Options Consultation - Submitted Response

Full name: **Chris Lambart**

Email: [REDACTED]

Statutory Bodies and Stakeholders

Organisation or Company: **National Trust**

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

Added to database: [REDACTED]

Topics (Contents page): **Site Allocation Policies**

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: **Not asked**

Comments: **Not asked**

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**

Comments: **The suggested Countryside Enhancement Area extends from the built up area of Stafford town to land adjoining the Shugborough Estate. The National Trust welcomes this initiative and recognizes its potential for delivering significant environmental and recreational benefits. The eastern part of the suggested area is within the Cannock Chase AONB. It is also an area with a rich historic environment, framed by and providing an important part of the setting to the grade I registered historic park at Shugborough, the Shugborough & Great Haywood Conservation Area, the Staffs and Worcs Canal Conservation Area and the Tixall Conservation Area. In recognition of this, the National Trust suggests that the aims of the proposed masterplan should also include conserving and enhancing the area's landscape and historic environment. These are already included in the design principles and enhancement programme of the Trent-Sow Parklands and Cannock Chase AONB HS2 Group.**

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:

No reply

From: Driver, Gillian [REDACTED]
Sent: 12 December 2022 11:12
To: Strategic Planning
Subject: Stafford Borough Local Plan 2020-2040: Preferred Options consultation
Attachments: 410086- Stafford Borough Local Plan NE response.pdf

Dear Sir/Madam

RE: Stafford Borough Local Plan 2020-2040: Preferred Options consultation

Please find attached Natural England's response for the above proposal.

Kind regards

Ms Gillian Driver
Lead Adviser
Planning for a Better Environment – West Midlands Team
[REDACTED]

Follow the West Midlands team on Twitter - [@NE_WestMids](https://twitter.com/NE_WestMids)

www.gov.uk/natural-england



During the current coronavirus situation, Natural England staff are working remotely to provide our services and support our customers and stakeholders. All offices and our Mail Hub are closed, so please send any documents by email or contact us by phone or email to let us know how we can help you. See the latest news on the coronavirus at <http://www.gov.uk/coronavirus> and Natural England's regularly updated operational update at <https://www.gov.uk/government/news/operational-update-covid-19>.

Stay at home, protect the NHS, save lives

In an effort to reduce Natural England's carbon footprint I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

Natural England offers two chargeable services – The Discretionary Advice Service ([DAS](#)) provides pre-application, pre-determination and post-consent advice on proposals to developers and consultants as well as pre-licensing species advice and pre-assent and consent advice. The Pre-

submission Screening Service ([PSS](#)) provides advice for protected species mitigation licence applications.

These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, reduce the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

Date: 12 December 2022

Our ref: 410086

Your ref: Stafford Borough Local Plan 2020 - 2040 - Preferred Options



Strategic Planning and Placemaking
Stafford Borough Council
Civic Centre
Riverside
Stafford
ST16 3AQ.



BY EMAIL ONLY

Dear Sir/Madam

Subject: Stafford Borough Council Local Plan - Preferred Options Consultation

Thank you for your consultation dated and received by Natural England on 19 October 2022.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Stafford Borough Council Local Plan - Preferred Options Consultation

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?

We are supportive of the environmental objectives.

Development Strategy and Climate Change Response

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

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)

Comments:

We have no comments to make on the overall policy though we do have some comments to make about some of the allocations which will be address further down.

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

Comments: We have no comments to make.

Policy 3. Development in the open countryside - general principles

Comments:

We note that section B of this Policy promotes the use of previously developed land rather than using greenfield land. We advise that brownfield sites can have a high ecological value, providing habitats for protected or priority species and other environmental and amenity benefit and this should be acknowledged in the policy and should be taken into account so that any harm can be avoided, mitigated or compensated for in a way which is appropriate given a site's identified value.

Further guidance on the ecological value of brownfield land is listed below:

[Brownfield Hub - Buglife](#), [UK Biodiversity Action Plan- Priority Habitat Descriptions](#) and [Mosaic Approach - Brownfield or Open Mosaic Habitat On Previously Developed Land](#).

Policy 4. Climate change development requirements

Comments:

We welcome and support the ambition for net zero carbon operational energy and resource/water efficiency. We advise that the plan should go further and would be more robust if it looked at ways to adapt and mitigate for the consequences of climate change. 'Nature-based solutions', are essential to achieving this. These involve the restoration of ecosystems for the long-term benefit of people and nature. Examples include:

- Expansion of tree and woodland cover - to strengthen woodland habitat networks, protect soils, provide shade whilst capturing additional carbon from the atmosphere. We acknowledge Policy 49. Trees and advise this could be strengthened to encourage enhancement and connectivity between existing woodland habitats and linking in with the Nature Recovery Network.
- Restoration and creation of [priority habitats](#) such as lowland heathland, lowland meadows, lowland fens and rush pastures. This improves places where people live and recreate, protecting carbon stores and strengthening the nature recovery network. Could this be added to Policy 46. Green and blue infrastructure network and/ or Policy 47. Biodiversity?
- Natural floodplain management, through the use of tree planting, habitat creation and restoration, to alleviate flooding further downstream. We note in the supporting text of Policy 42. Flood risk that natural flood management will be encouraged- could this be added to the policy instead?
- Retrofitting of green and blue infrastructure such as trees and sustainable urban drainage systems (SUDS) in urban localities to address flood risk and heat island effects. Could this be added to Policy 43. Sustainable drainage and Policy 46. Green and blue infrastructure network?

Within your Plan we suggest you consider including the following actions:

1. Set an ambitious climate-specific policy with targets for reducing greenhouse gas emissions. Plans should include a clear commitment to achieving the national statutory target of net zero emissions by 2050, with policies to secure significant reductions in greenhouse gas emissions over the Plan period;
2. Identify, protect and plan to restore all areas of peatland. Our mapping system shows that there are areas of peat in the Plan area. Ideally any plan to restore peatland, should wherever possible include management of the catchment areas that support the peatland. We would advise extending this approach to shallow peaty areas in addition to deep peats.
3. Identify opportunities to increase tree and woodland cover consistent with the UK target. Wherever possible, this should provide multi-functional benefits. Planting on peatlands and other open habitats must be avoided.
4. Identify areas where nature-based solutions can provide benefits to people whilst reducing climate change vulnerability in the natural environment.

5. Identify habitats and protected sites that are particularly vulnerable to the impacts of climate change and consider how the planning system can work to reduce these vulnerabilities.

We advise that these actions are integrated into a strategic approach alongside green infrastructure, health and wellbeing, biodiversity net gain, natural flood management, air and water quality to deliver multifunctional benefits to people and wildlife. The Plan should make clear that development will be consistent with these policies, to ensure sustainable development is properly achieved across the Plan period. Meaningful targets should be set that can be appropriately monitored over the Plan period to demonstrate the effectiveness of the Plan/Policy in addressing climate change and to ensure appropriate remedial action can be taken as necessary.

Climate change adaptation and mitigation links in with Nature Recovery which aims to expand and connect wildlife habitats to support species recovery and deliver wider benefits such as carbon capture, water quality improvements, natural flood risk management and recreation in line with the Lawton principles set out in [Making Space for Nature](#) and paragraph 179a. of the [National Planning Policy Framework](#). We note the links in the supporting text to policies on multifunctional open space and enhancements of flood management and green infrastructure through Countryside Enhancement Areas.

We are aware of the following toolkit designed for local authorities to enhance climate resilience and protect nature, which you might find helpful: [The Nature Recovery and Climate Resilience Playbook - UKGBC - UK Green Building Council](#).

For further information and resources please see Annex 1.

Policy 5. Green Belt

Policy 6. Neighbourhood plans

Comments: We have no comments to make.

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?

Comments:

We note that Meecebrook Garden Community concept masterplan, design and development principles and infrastructure delivery schedule are under preparation. We would be happy to feed into this.

Potential environmental impacts:

- The site is within 3km of Midland Meres & Mosses - Phase 2 Ramsar (Cop Mere SSSI) and could be impacted by the proposal. We note that the Habitats Regulation Assessment (HRA) acknowledges this and notes that further assessment is required.
- Part of the site is within the 15km of Cannock Chase SAC and could have recreational impacts. We note that this is addressed in the HRA.
- The site is within the hydrological catchment of Doxey and Tillington Marshes Site of Special Scientific Interest (SSSI) and therefore could have impacts on water quality and quantity.
- Our mapping system shows that there are several areas of priority habitat within the site, including deciduous woodland, lowland fens.
- Impacts on soil and best and most versatile land. The Sustainability Appraisal (SA) identifies that there is likely to be a loss of grade 2 and 3. To support plan allocations (and subsequent

planning applications) sites (over 5ha agricultural land) should have a site-specific Soils Management Plan informed by a detailed Agricultural Land Classification (ALC) and soil resource survey, in line with best practice guidance:) [Code of practice for the sustainable use of soils on construction sites - GOV.UK \(www.gov.uk\)](#).

Opportunities:

- The concept masterplan should take into account existing biodiversity on site and the wider landscape, be designed to deliver net gain for biodiversity and strengthen the nature recovery network, taking into account the [Stafford Borough Council Nature Recovery Network Mapping](#). The plan should aim to be ambitious and deliver a far greater value than 10% net gain.
- To link in with the plans policies for climate change and pollution, you may wish to consider the 20 Minute Neighbourhood Model. See further information:
 - [Town and Country Planning Association 20-Minute Neighbourhood](#)
 - [Sustrans What is a 20-minute neighbourhood?](#)

We are aware of the following guidance on garden cities:

[Garden City Standards for the 21st Century: Practical Guides for Creating Successful New Communities - Town and Country Planning Association \(tcpa.org.uk\)](#)

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?

Policy 9. North of Stafford

Policy 10. West of Stafford

Policy 9/10 Comments:

We note that policies 9 and 10 include measures to avoid and mitigate for impacts on Cannock Chase SAC and to retain and enhance the green infrastructure network and welcome this.

The sites are either within the hydrological catchment of Doxey and Tillington Marshes SSSI and/or Baswich Meadows SSSI and therefore could have impacts on water quality and quantity if not designed appropriately. We advise that that this should be added to the policy and the Essential Site-Specific Requirements if not already in them.

Both Doxey and Tillington Marshes SSSI and Baswich Meadows SSSI are within 200m of a road and the increases in traffic as a result of these allocations could have an impact on these sites alone and cumulatively. 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 (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. We consider that the designated sites at risk from *local impacts* are those within 200m of a road with increased traffic¹, 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.

We note that both the HRA and Stafford Borough – Ecological assessment of potential new Local Plan

¹ The ecological effects of diffuse air pollution (2004) English Nature Research Report 580
Design Manual for Roads and Bridges Volume 11, Section 3 Part 1 (2007), Highways Agency

sites using Nature Recovery Network (NRN) mapping and submitted sites provide information on potential environmental impacts from these allocations and these should be reflected within the plan if they are not already.

Some sites are on best and most versatile land and will therefore result in a loss. To support plan allocations (and subsequent planning applications) sites (over 5ha agricultural land) should have a site-specific Soils Management Plan informed by a detailed Agricultural Land Classification (ALC) and soil resource survey, in line with best practice guidance: [Code of practice for the sustainable use of soils on construction sites - GOV.UK \(www.gov.uk\)](http://www.gov.uk).

Policy 11. Stafford Station Gateway

Policy 11 Comments:

Policies 9 and 10 include measures to avoid and mitigate for impacts on Cannock Chase SAC but Policy 11 does not include anything about Cannock Chase SAC despite potentially impacting the SAC, why is this?

The site is within close proximity of Doxey and Tillington Marshes SSSI and upstream of Baswich Meadows SSSI and the proposals are likely to impact on the SSSIs.

- The design of the site will need to take into account the potential impacts on the SSSI and be designed to avoid any impacts.
- The site is within the flood plain and is linked of Doxey and Tillington Marshes SSSI and Baswich Meadows SSSI. Any development would need to ensure that in the event of the site being flood impacts on these SSSIs were prevented.
- The site is within the hydrological catchment of Doxey and Tillington Marshes SSSI and Baswich Meadows SSSI and therefore could have impacts on water quality and quantity if not designed appropriately.
- Both Doxey and Tillington Marshes SSSI and Baswich Meadows SSSI are within 200m of a road and the increases in traffic as a result of these allocations could have an impact on these sites alone and cumulatively.
- We note that in the Stafford Borough Nature Recovery Network Mapping document that this site is marked down as opportunity for wetland and woodland creation. Considering the sites proximity to the SSSIs, it's location to the floodplain and the Council's aspirations in terms of climate change, we would advise that this site would be better used for natural flood management.

We note that both the HRA and Stafford Borough – Ecological assessment of potential new Local Plan sites using Nature Recovery Network (NRN) mapping and submitted sites provide information on potential environmental impacts from these allocations and these should be reflected within the plan if they are not already.

Policy 12. Other housing and employment land allocations.

Policy 12 Comments:

Land east of Ladfordfields (SEI01)

The site is within the hydrological catchment of Doxey and Tillington Marshes SSSI and Baswich Meadows SSSI and therefore could have impacts on water quality and quantity if not designed appropriately. We advise that that this should be added to the Essential Site-Specific Requirements.

For proposed gypsy and traveller allocations at Hopton and Weston please see comments for Policy 30(question 9).

Allocations for Woodseaves

Loynton Moss SSSI is within close proximity to Woodseaves and is within 200m of the A519 and the increases in traffic as a result of these allocations could have an impact on this sites alone and cumulatively. The site is already significantly exceeding its critical levels for ammonia and nitrogen deposition.

We note that the SA has identified that there will be a loss of best and versatile agricultural land. To support plan allocations (and subsequent planning applications) sites (over 5ha agricultural land) should have a site-specific Soils Management Plan informed by a detailed Agricultural Land Classification (ALC) and soil resource survey, in line with best practice guidance:) [Code of practice for the sustainable use of soils on construction sites - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/362222/Code_of_practice_for_the_sustainable_use_of_soils_on_construction_sites_-_GOV.UK_(www.gov.uk).pdf).

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?

Policy 13. Local Green Space

Policy 13 Comments: We have no comments to make.

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

Policy 15. Stone Countryside Enhancement Area

Policy 14/15 Comments:

We welcome these policies and would welcome the opportunity to feed into the delivery masterplans. There are opportunities in terms of natural flood management and delivery of the Nature Recovery Network and net gain.

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?

Comments: We have no comments to make.

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?

Comments:

POLICY 20. Agricultural and forestry development

Agricultural developments can have significant impacts on the environment through water and air pollution. Poly tunnels can cause significant surface water pollution and we would advise that this is recognised in the supporting text.

POLICY 22. Canals

There is an opportunity in this policy to link in with the Nature Recovery Network and green and blue infrastructure and this should be acknowledged within the policy.

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.

Comments: We have no comments to make.

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?

Comments:

Hopton and Weston are both within the hydrological catchment of Pasturefields Salt Marsh Special Area of Conservation (SAC) /Site of Special Scientific Interest (SSSI) . The SAC/SSSI could be impacted by increases in sewage and surface water run off from these proposed sites and we note that Habitats Regulations Assessment of the Stafford Borough Local Plan 2020-2040 (Preferred Options) (dated 10 October 2022) acknowledges that water quality and quantity could impact the SAC and further work is required to assess the impacts.

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, 31, 32 and 33.

Comments: We have no comments to make.

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.

Comments:

POLICY 40. Renewable and low carbon energy

We note that there are a number of potential renewable energy- solar sites to the east of Stafford and in close proximity to the Cannock Chase Area of Outstanding Natural Beauty (AONB) which could have potentially significant landscape/visual impacts on the setting of the AONB. We advise you to look at the [Cannock Chase AONB Views and Setting Guidance](#) to help understand and assess potential impacts on the AONB from the proposed site.

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?

Comments:

POLICY 42. Flood risk

42.5- There are also links to the nature recovery network through natural flood management and we would advise making that link.

POLICY 43. Sustainable drainage

We welcome this policy and the links made to reducing pollution and opportunities for landscape and biodiversity enhancement. Noting the supporting text in regard to sewer flooding incidents (paragraph 43.3), we would advise that you include in the policy text taking opportunities to retrofit SUDs where possible. Information on retrofitting SUDs can be found [here](#).

POLICY 44. Landscapes

We have no comments to make.

POLICY 45. Cannock Chase Area of Outstanding Natural Beauty (AONB)

We welcome this policy and note references to AONB guidance in 45.1.

POLICY 46. Green and blue infrastructure network

We welcome this policy and the links to green and blue infrastructure. Could the policy include a minimum amount of green and blue infrastructure for development sites?

Green and blue infrastructure should take into account, and be resilient to, the impact of climate change and include natural solutions/measures alleviate the impact of climate change, e.g., through carbon sequestration, natural flood/surface water management, helping with urban cooling and provision of SUDs, microclimate adaptation etc. It can play a role in enabling species to move from less favourable habitats to more favourable ones as climate changes. Green infrastructure can be part of an overall nature recovery network. Advice on nature recovery networks can be found here: [Nature Networks Evidence Handbook](#). The local approach to Green infrastructure should be informed by the forthcoming Local Nature Recovery Strategies which will set out what sort of habitats/features are priorities for an area and in what locations.

We note and welcome the inclusion under section C the requirement to contribute to extending the green network and the requirements for accessible natural green space. We wanted to make you aware of Natural England's Accessible Natural Greenspace Standards (ANGSt). These standards are currently being updated and are due to be published on the [Green Infrastructure Framework - Principles and Standards for England](#) website in January 2023.

POLICY 47. Biodiversity

We welcomes and supports this policy and have the following advice:

Biodiversity Net Gain

The minimum net gain is 10%, but we would advise setting a more ambitious amount.

We would also advise that you include the following within the policy:

- It needs to be clear within the policy that biodiversity net gain is not applied to irreplaceable habitats and it should also be made clear that any mitigation and/or compensation requirements

- for European sites should be dealt with separately from biodiversity net gain provision.
- The policy should set out how biodiversity net gain will be delivered and managed through the lifetime of the scheme.
- Requirements to monitor biodiversity net gain should be included within the policy. This should include indicators to demonstrate the amount and type of gain provided through development. The indicators should be as specific as possible to help build an evidence base to take forward for future reviews of the plan, for example the total number and type of biodiversity units created, the number of developments achieving biodiversity net gains and a record of on-site and off-site contributions.

Climate change

We advise that the policy should include wording that acknowledges the likely effects of climate change on biodiversity and the vulnerability of key assets to those effects, the need to maintain/establish resilient ecosystems and the need to accommodate change in natural systems by recovering nature and natural processes.

See [Climate Change Adaptation Manual](#) and the [Biodiversity Climate Change Impacts Report Card](#) for help with climate change impacts on sites and features.

Geological sites

The policy includes protection of geological sites but does not cover enhancement and we would advise that this is added in. It should be noted that SSSIs can be notified for their geological features.

Irreplaceable habitats

This policy does not include protection for irreplaceable habitats, though we note that the POLICY 49. Trees does for ancient woodland and ancient or veteran trees, however this does not include all irreplaceable habitats, which include ancient woodland, ancient and veteran trees, blanket bog, limestone pavement, sand dunes, salt marsh and lowland fen.

Nature Recovery Network

The policy should safeguard components of local wildlife-rich habitats and wider ecological networks, promote the conservation, maintenance, restoration and enhancement of priority habitats and ecological networks. This needs to be strengthened within the policy.

We advise including the Natural England's Midlands Heathland Heartland partnership and the Purple Horizons Nature Recovery Project within the supporting text of the policy. This project aims to create, enhance and connect up fragmented heathland habitat and other wildlife rich habitats between Cannock Chase and Sutton Park which will benefit local communities in escaping the urban environment to 'recharge their internal resilience through nature'. The project will link and buffer existing sites while creating a network of further complementary habitats, while also providing new public access and recreational opportunities and health benefits. This links in with the government's [25 Year Environment Plan](#) and the Council aims to facilitate nature recovery networks. See Annex 2 for further information on the project.

POLICY 48. Cannock Chase Special Area of Conservation (SAC)

We welcome and support this policy. However section A needs to be reworded to ensure it is clear what will not be permitted.

POLICY 49. Trees

We welcome this policy and provide the following advice:

The policy should encourage the enhancement of existing woodland habitats and increasing connectivity between woodlands. We would advise linking the Policy to the Nature Recovery Network.

Woodland creation should be located on poor agricultural land, urban/urban fringe to derive maximum multifunctional benefits. Natural regeneration should be encouraged particularly when located adjacent to existing woodlands to deliver extra wildlife benefits from scrub development.

Where there are inappropriate existing forestry plantations on former priority habitat (e.g., heathland, peatland, ancient woodland sites) local plans should seek to restore these habitats by supporting plantation removal.

POLICY 50. Pollution

We welcome this policy.

POLICY 51. Air quality

We note the policies focus on impacts on humans rather than the environment and therefore have no comments to make.

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?**

Comments:

POLICY 52. Transport

We note the references in paragraph A.4. to mitigating environmental impacts of transport and welcome this. We would advise that you include water quality within the list of impacts.

We support the prioritisation of sustainable travel and the protecting and enhancing of public rights of way and access.

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?

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

Comments:

Traffic data

As acknowledged in the HRA, traffic data is required to understand the potential impacts on protected sites and to inform the HRA.

Soils and Best and Most Versatile Agricultural Land

The site allocation assessments do not appear to take account of soils impacts or impacts on Best and Most Versatile Agricultural (BMV) Land, though we note that the SA has taken this in to account. There appears to be no site specific ALC data within the evidence and consequently if BMV land is to be impacted no justification for allocating on BMV land. We refer you to paragraphs 174a and 174b of the NPPF:

174. Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

River Basin Management Plans

The Local Plan should be based on an up to date evidence base on the water environment and as such the relevant River Basin Management Plans should inform the development proposed in the Local Plan. These Plans (available [here](#)) implement the EU Water Framework Directive and outline the main issues for the water environment and the actions needed to tackle them. Local Planning Authorities must in exercising their functions, have regard to these plans.

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.

Maps

We note that the maps which show protected sites like SACs and SSSIs, do not show which sites are RAMSARs. There are two in Stafford Borough Midland Meres and Mosses Phase I Ramsar and Midland Meres and Mosses Phase II Ramsar spread over three SSSIs and these should be shown on the maps.

Section 47.2

Chartley Moss is also a RAMSAR- Midland Meres and Mosses Phase I Ramsar- the text should be amended to reflect this.

Soil and Best and Most Versatile agricultural land.

We are disappointed that no policies specially address soil protection or loss of best and most versatile agricultural land. We would advise adding in a policy for soil protection that includes best and most versatile agricultural land, in line with paragraph 174 a) and b) of the [National Planning Policy Framework](#) and the government's [25 Year Environment Plan](#).

The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpin our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver, for example:

- Safeguard the long term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future.
- To avoid development that would disturb or damage other soils of high environmental value (e.g. wetland and other specific soils contributing to ecological connectivity, carbon stores such as peatlands etc) and, where development is proposed.
- Ensure soil resources are conserved and managed in a sustainable way.

Further information can be found in [Natural England's Technical Information Note 049 on Agricultural Land Classification \(ALC\)](#).

We would advise that the plan refers to sources of Agricultural Land Classification and Best and Most

Versatile mapping and data which will include but not limited to: the www.magic.gov.uk website and Natural England. For example [Agricultural Land Classification map West Midlands Region \(ALC004\)](#) and [Likelihood of Best and Most Versatile \(BMV\) Agricultural Land - Strategic scale map West Midlands Region \(ALC016\)](#).

The plan should recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils. Mitigation should aim to minimise soil disturbance and to retain as many ecosystem services as possible through careful soil management during the construction process. We advise that policy should support developments that enhance soils, avoid soil sealing and provide mitigation to avoid soil disturbance

To support plan allocations (and subsequent planning applications) sites (over 5ha agricultural land) should have a site-specific Soils Management Plan informed by a detailed Agricultural Land Classification (ALC) and soil resource survey, in line with best practice guidance: the [Defra Code of practice for the sustainable use of soils on construction sites](#).

Sustainability Appraisal Report

Natural England has no specific comments to make.

Habitats Regulations Assessment of the Stafford Borough Local Plan 2020-2040 (Preferred Options)

We welcome the HRA and note that the assessment has concluded that further information is required.

We wish to provide the following advice:

- Parts of the Borough are within the catchment of the Humber Estuary SAC/SPA/RAMSAR. Potential impacts from the plan on the Estuary do not appear to have been assessed.
- Section 6.2-6.6. Hydrological issues and European sites potentially at risk (page 54-55). Polluted surface water is also an issue and this should also be considered in the HRA.
- 7. Appropriate assessment topic: Air Quality (pages 63-70). Whether a road is major or minor is irrelevant, what is relevant when assessing potential impacts is understanding the affected road network and its proximity to protected sites.
- When assessing impacts on SACs, we advise looking at both the Site Improvement Plans and the Conservation Objectives Supplementary advice. Most of the Site Improvement Plans are eight years old and not necessarily up to date. Whereas the Conservation Objectives Supplementary advice for the site are usually more up to date and detailed.

For air quality, we would advise looking at the [Air Pollution Information System](#) which has up to date data on air pollution for protected sites and can be used to understand whether a protected site is in exceedance or not.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Gillian Driver on [REDACTED]. For any new consultations, or to provide further information on this consultation please send your correspondences to [REDACTED]

Yours sincerely

Gillian Driver

Ms Gillian Driver

Lead Adviser

Land use planning – West Midlands Area Team

Annex 1

Climate change – further resources

Natural England has published a range of resources to help with the recommended actions. Please see below links to further resources that may be useful in developing local policy to address climate change within the local authority area.

- The [Climate Change Adaptation Manual](#) - provides extensive information on climate change adaptation for the natural environment. It considers the potential impacts of climate change on individual priority habitats and outlines possible adaptation responses. It includes the Landscape Scale Adaptation Assessment Method to assist those wanting to undertake a climate change vulnerability assessment for an area larger than an individual site or specific environmental feature, focussing on identifying vulnerabilities to climate change.
- The [National Biodiversity Climate Change Vulnerability Model](#) is a mapping tool that helps identify areas likely to be more vulnerable to the impacts of climate change.
- [Carbon Storage and Sequestration by Habitat 2021 \(NERR094\)](#) – a recently updated report that reviews and summarises the carbon storage and sequestration rates of different semi-natural habitats that can inform the design of nature-based solutions to achieve climate mitigation and adaptation.
- A range of spatial data including - [National Biodiversity Climate Change Vulnerability Assessment \(NBCCVA\)](#), National Habitat Network, [Species Risks and Opportunities](#) climate envelope modelling, etc. These datasets are included in the Landscape Scale Climate Change Assessment Method in the Climate Change Adaptation Manual, the Data and Tools chapter in the Nature Networks Evidence Handbook and NRN toolkit list. Furthermore, the fragmentation metric of the NBCCVA tool provides the Biodiversity and Connectivity Tool within the Biodiversity Metric of Net Gain.
- The [Nature Networks Evidence Handbook](#) – aims to help the designers of nature networks by identifying the principles of network design and describing the evidence that underpins the desirable features of nature networks. It builds on the Making Space for Nature report of Lawton et al. (2010), outlining some of the practical aspects of implementing a nature network plan, as well as describing the tools that are available to help in decision making.
- [Natural England Climate Change webinars](#) - a range of introductory climate change webinars available on YouTube.

The following are planning and climate change documents which looked at climate change, species responses, ecological networks and spatial planning:

- [Climate Change and Biodiversity Adaptation: The Role of the Spatial Planning System \(NECR004\)](#)
- [Making space for wildlife in a changing climate \(NE263\)](#)
- [Spatial planning for biodiversity in our changing climate \(ENRR677\)](#)
- [The Reducing UK emissions: 2020 Progress Report to Parliament](#) includes new advice to the UK Government on securing a green and resilient recovery following the COVID-19 pandemic. It recommends that Ministers seize the opportunity to turn the COVID-19 crisis into a defining moment in the fight against climate change. Its report highlights key investment priorities such as tree planting, green infrastructure, and infrastructure to make it easy for people to walk, cycle, and work remotely.
- Biodiversity Climate Change Impacts Report Card series (including the Biodiversity Report Card, with NE specialists as the lead authors [Climate Change Impacts Report Cards](#))
- [Carbon-and-Habitats-Position-Statement-FINAL.pdf \(cieem.net\)](#) CIEEM July 2021 'Position Statement on Habitat Creation and Restoration for Tackling the Climate Emergency.'
- [TCPA & RTPI Climate Guide for Local Authorities](#) The Climate Crisis A Guide for Local Authorities on Planning for Climate Change, TCPA & RTPI 2021.

We are also aware of the following resources:

- [The impact of the environment and climate change on future infrastructure supply and demand \(nic.org.uk\)](http://nic.org.uk)
- [The Climate Crisis – a guide for local authorities on planning for climate change - Town and Country Planning Association \(tcpa.org.uk\)](http://tcpa.org.uk)
- [Guide 14 building climate-resilient new communities \(tcpa.org.uk\)](http://tcpa.org.uk)
- [Local Partnerships Climate Adaptation Toolkit v1.pdf \(localpartnerships.org.uk\)](http://localpartnerships.org.uk)
- [TDAG- First Steps in Urban Heat - For built Environment Practitioners \(bham.ac.uk\)](http://bham.ac.uk)
- [Overheating in New Homes - Good Homes Alliance](http://GoodHomesAlliance.org.uk)

Annex 2

Midlands Heathland Heartland and Purple Horizons.

Natural England's Midland Heathland Heartland Project partnership alongside the Purple Horizons Landscape scale Nature Recovery Area Project represent a 50 year vision for the areas natural world that will connect up people with nature and allow them both to move between one another across a landscape scale area. It represents an exemplary practical application of a Local Nature Recovery Network model that closely fits with the aspirations of quality place-making of the Stafford Borough Local Plan. This project is a trailblazer opportunity for the Stafford Borough to demonstrate to other areas how it can innovatively create high quality biodiverse green infrastructure that links high quality wildlife open spaces between the urban and rural fringes, while also allowing people to integrate and reap the mental and physical wellbeing benefits of being closer to nature.

Midlands Heathland Heartland (MHH): This long-term partnership initiative aims to create landscape-scale enhancements for people and wildlife in the Black Country and Staffordshire. The focus is on connecting Sutton Park SSSI/ NNR to Cannock Chase SAC. The 50 year vision agreed by 10 partnership organisations in 2018 is:

The New Chase. A thriving network of important habitats and environmental assets, resilient to climate change, with improved biodiversity and enjoyed by people in a sustainable way. Using a partnership approach we want to better manage, protect, expand and enhance lowland heathland and associated habitats to improve biodiversity. We want to link and buffer these sites and also create a network of further complementary habitats. We also want to facilitate integrated sustainable public access and education to increase the value that people put on local biodiversity and the landscape. We want this area to be an exemplar, demonstrating how nature and people can live and work together in a balanced way.

This links in with the government's 25 Year Environment Plan and the Council aims to facilitate nature recovery networks.

The Midlands Heathland Heartland partnership has carried out heathland opportunity mapping using the best available local data from ecological record centres (EcoRecord and Staffordshire Ecological Record Centre), modelled species-flow between heathlands using Condatis and carried out natural capital opportunity mapping. It has mapped the GI-Debt i.e. where green infrastructure needs are not met and identified new opportunities through reviewing local minerals site's restoration plans.

The species-flow modelling revealed that the area along the eastern boundary of Walsall District was a bottleneck where species would find it hard to move north from Sutton Park to Cannock Chase,

something that will be important for climate change adaptation. Expanding the heathlands in Walsall became the focus of a Nature Recovery Project starting in 2021-2022 called Purple Horizons.

Purple Horizons Nature Recovery Project

Purple Horizons is a partnership project starting in 2021, facilitated and funded by Natural England, involving Walsall Council, Birmingham and the Black Country Wildlife Trust, Lichfield District Council, Natural England, Staffordshire Wildlife Trust, The Black Country UNESCO Global Geopark and the University of Birmingham.

The project will enhance, enlarge, create and connect heathland, wetland, grassland and woodland mosaics, starting in a priority area for climate change adaptation (a bottleneck to species flow close to Brownhills) and for climate change mitigation (peatland in the River Tame headwaters). It will be engaging with communities in the built-up, deprived areas of Walsall (one of the top 10% most deprived local authorities in England), to understand their needs and where habitat creation and green infrastructure will deliver the greatest health benefits.

The project will use a natural capital approach and will undertake a green finance analysis to better understand how to bring in new private finance for enhancing and repairing natural capital in the area. The initiative offers huge opportunity to secure business investment through biodiversity net gain, carbon off-setting and habitat banking. Contact Natural England for more information of other opportunities.

From: [REDACTED]
 Sent: 06 December 2022 10:40
 To: Strategic Planning Consultations
 Subject: FW: Stafford - Meecebrook Garden Village Network Rail response
 Attachments: Stafford Meecebrook Garden Village Network Rail response.pdf

From: Diane Clarke [REDACTED]
 Sent: 06 December 2022 08:25
 To: [REDACTED]
 Cc: [REDACTED]
 Subject: Stafford - Meecebrook Garden Village Network Rail response

OFFICIAL

Please see attached Network Rail’s response to the Meecebrook Garden Village proposal.

From

Diane Clarke
 Town Planning Technician NW&C
 AssocRTPI
 Network Rail
 Email: [REDACTED]

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Network Rail Infrastructure Limited registered in England and Wales No. 2904587, registered office [REDACTED]



To:
FAO Town Planning Team
Stafford BC
Email: [REDACTED]

From: Town Planning Team NW&C
Network Rail

[REDACTED]

Email: [REDACTED]

Date: 6th December 2022

FAO Planning Team

MEECEBROOK GARDEN SETTLEMENT	6000 DWELLINGS
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Thank you for consulting Network Rail on the above proposal.

Network Rail has no objection in principle to the development of a new settlement in the Meecebrook area. However, Network Rail does have significant reservations over the suggested provision of a new station on the West Coast Main Line in the location shown on the proposed layout plan. Such a location will need to be subject to detailed validation in terms of strategic network fit. At this stage we would therefore recommend evaluating a broader range of station options. We appreciate that siting a station within the centre of the proposed new Garden Village would be optimal for new residents, however this may not be achievable.

Formal engagement with Network Rail is strongly recommended to ensure that a realistic and deliverable station proposal can be developed to support the sustainable transport aims of the Garden Village, and we'd be happy to work with you to look at a range of options with strategic fit for the wider rail system in mind.

There are other considerations that Network Rail would need to engage on as plans develop, such as drainage arrangements, access to the track for maintenance purposes, and a requirement to assess the bridge rights of existing and any proposed new bridges over the railway.

Yours sincerely

Diane Clarke
Town Planning Technician NW&C
Network Rail

From: Preferred Options Consultation [REDACTED]
Sent: 09 December 2022 11:21
To: Strategic Planning Consultations
Subject: Preferred Options Consultation - Submitted Response

Full name: **Noel Bell**

Email: [REDACTED]

Statutory Bodies and Stakeholders

Organisation or Company: **Newcastle-under-Lyme Borough Council**

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

Added to database: [REDACTED]

Topics (Contents page): **General Comments**

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: **Not asked**

Comments: **Not asked**

Site Allocation Policies

Q4 - Do you agree with the proposed allocations?

Policy 9 (North of Stafford): **Not asked**

Comments: **Not asked**

Policy 10 (West of Stafford): **Not asked**

Comments: **Not asked**

Policy 11 (Stafford Station Gateway): **Not asked**

Comments: **Not asked**

Policy 12 (Other housing and employment land): **Not asked**

Comments: **Not asked**

Site Allocation Policies (continued)

Q5 - Do you agree with the proposed allocations?

Policy 13 (Local Green Space): **Not asked**

Comments: **Not asked**

Policy 14 (Penk and Sow): **Not asked**

Comments: **Not asked**

Policy 15 (Stone Countryside): **Not asked**

Comments: **Not asked**

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: **Not asked**

Comments: Not asked

Q7 - The Stafford Borough Plan proposes policies around the town centres uses, agriculture and

forestry development, tourism development and canals. Do you agree? **Not asked**

Comments: **Not asked**

Housing Policies

Q8 - The local plan proposed a policy (23) on affordable housing. Do you agree? **Not asked**

Comments: **Not asked**

Q9 - The local plan proposes a policy (30) to help meet identified local need for pitches for Gypsies and Travellers. Do you agree? **Not asked**

Comments: **Not asked**

Q10 - The local plan proposes policies around homes for life, rural exception sites, new rural dwellings, replacement dwellings, extension etc. Do you agree? **Not asked**

Comments: **Not asked**

Design and Infrastructure Policies

Q11 - Do you agree with policies? **Not asked**

Comments: **Not asked**

Environment Policies

Q12 - Do you agree with policies? **Not asked**

Comments: **Not asked**

Connections

Q13 - Do you agree with policies? **Not asked**

Comments: **Not asked**

Evidence Base

Q14 - Have we considered all relevant studies and reports? **Not asked**

Comments: **Not asked**

Q15 - Do you think there is any further evidence required? **Not asked**

Comments: **Not asked**

General Comments:

As highlighted in our virtual discussions of 9 November 2022, the most significant point of discussion surrounds the 2000 figure (highlighted in Para 1.3) that could contribute to meeting the unmet housing needs of other authorities in the region. Owing to Newcastle-

under-Lyme's (NuL) encroachment into the green belt, this has the potential (in principle) to offset some of the Borough's pressures of development. However, this needs to be balanced against the delivery assumptions (& risks of non-delivery) associated with the Meecebrook Garden Community (where it is stated by Stafford in Para 1.4 that any other Authorities unmet need would be located), as well as the site's relationship to the housing market area for NuL. The Garden Community is not contiguous within any settlement that falls within the administrative boundaries of NuL, nor is it in close proximity to those areas where we are in all likelihood looking to advocate Green Belt release. Consequently, whilst remaining open-minded, we need to be conscious that these aspects should be considered by both authorities further within Duty to Cooperate discussions, as well as in subsequent rounds of consultation on Stafford's emerging plan. In the near term, Stafford's response to any formal request by NuL to accommodate some of its unmet housing need will also be a determinant as to what approach is taken. Generally, there is a lot to commend in Stafford's emerging Plan, from its Development Strategy with a significant focus on Stafford itself, the breadth & clarity of policies, as well as the ambition to deliver a new Garden Community (detailed within Policy 7). Whilst NuL BC does not have any issue (and consider that it sets in place a comprehensive strategic basis for its delivery) with the specific policy context to this development, the delivery of infrastructure for the Garden Community & its elucidation through the yet to produced Framework Masterplan SPD makes drawing assumptions as to when phases of development could come forward especially difficult to establish at this stage. Any reliance on this to form an integral part of NuL's housing supply would therefore require a greater degree of understanding & justification for any formal decision as to its merits to be reached. Indeed, it is conceded in Para 1.4 that if evidence indicates that the Garden Community can deliver less than 3000 homes in the 2020-2040 plan period, this may require a reassessment of how much of the need from elsewhere can be accommodated. It is also acknowledged that Stafford has a large number of neighbouring authorities, from which there may be any number of competing requests in due course. Ongoing evidence base to accompany NuL's Local Plan, in particular related to housing & economic need, will influence the stance taken towards aspects such as strategic employment sites' scale & location, and whilst currently we have no objection to the uplifted growth targets proposed by Stafford, should these be carried forward to the Publication Draft, further thought will be given to the extent (if any) they could prejudice NuL's own objectives, based on an understanding of the most contemporary information for the Borough that emerges in the coming months. These comments are without prejudice to any that NuL BC might wish to make subsequently, either via its commitment to continued dialogue through the Duty to Co-operate, or through consultation on future iterations of Stafford's Local Plan.

From: [REDACTED]
Sent: 12 December 2022 10:33
To: Strategic Planning Consultations
Subject: FW: Norbury Parish Council response to Preferred Options document
Attachments: letter SBC re Preferred Options Document.docx

From: [REDACTED]
Sent: 12 December 2022 10:20
To: [REDACTED]
Cc: [REDACTED]
Subject: Norbury Parish Council response to Preferred Options document

Good morning [REDACTED]

Please find attached Norbury PC's response to SBC's Preferred Options document.

Kind regards

Jayne

Jayne Cooper
Clerk, Norbury Parish Council

NORBURY PARISH COUNCIL

Email: [REDACTED]

12th December 2022

[REDACTED]
Strategic Planning, Stafford Borough Council

Dear [REDACTED]

Response to Local Plan 2020-2040 Preferred Options Consultation

Norbury Parish Council has studied the Preferred Options document and is pleased that the hierarchy system now includes a fifth tier and some of the smaller parishes, including Norbury, have a settlement boundary. However, Council was disappointed that it had not been consulted on the drawing up of the settlement boundary and would request that Norbury Parish Council has an opportunity to discuss the settlement boundary with Stafford Borough Council.

For many years, Norbury has been a static village with very little development, mainly barn conversions. Norbury PC believe that local parishioners would welcome the opportunity for some development to allow younger families, often young people who have been raised in the village, to have an opportunity to remain in the village. Consultation with villages that have been included in the Tier 5 list may well have shown this to be the case elsewhere too.

Yours sincerely

Jayne Cooper

Clerk Norbury Parish Council

From: Preferred Options Consultation [REDACTED]
Sent: 17 November 2022 16:12
To: Strategic Planning Consultations
Subject: Preferred Options Consultation - Submitted Response

Full name: **Carl Riding**

Email: [REDACTED]

Statutory Bodies and Stakeholders

Organisation or Company: **NSCG**

Age: [REDACTED]

Added to database: [REDACTED]

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

Vision and Objectives

Q1 - Which 3 are most important to you? 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. and To provide an attractive place to live and work and support strong communities that promote health and wellbeing.

Development Strategy and Climate Change

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

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

Comments: **The town-centre developments, particularly the Stafford Station Gateway are a high priority for jobs and technical skills. Cannot see the sense in creating the Meecebrook development adjacent to the North Staffordshire Green Belt land in an area already blighted by HS2. All this does is encourage further car use due to the relative lack of infrastructure. Distribution Warehouse developments along the A34 on semi-rural land provides a poor return of jobs compared to land lost. Low value, space hungry industries supporting vehicle distribution networks.**

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

Comments: **Meecebrook needs rethinking and existing larger settlements should be expanded to include improved infrastructure in towns.**

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

Comments: **Agree with the policy but not clear how the proposed Meecebrook development is compatible with this.**

Policy 4 (Climate change and development requirements): **Yes**

Comments: **Low quality housing should not be approved and all new housing developments should comply with NZC requirements.**

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

Comments: **But the Meecebrook proposals seem at odds with Green Belt policy. Why not extend the Green Belt to reach across the Western side of the Borough?**

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

Comments: **Enhance existing neighbourhoods rather than creating new.**

Meecebrook Garden Community

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

Comments: **Cannot see the logic in creating a new, huge, garden community which is remote from any existing facilities or infrastructure. There was opportunity to develop land along the A34 to join Stafford and Stone which is currently being given over to low skilled, low paid, space-hungry Distribution Warehouses.**

Site Allocation Policies

Q4 - Do you agree with the proposed allocations?

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

Comments: **Land for housing should adjoin existing larger settlements rather than creating new garden communities.**

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

Comments: **Development to expand existing settlements/towns is preferable.**

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

Comments: **This development should be the Council's number one priority. To open up the Station from the West could completely change the nature of the whole town, making it a superb town to live for highly skilled individuals. It is imperative that this prime location is not wholly given over to housing. There is a generational opportunity to create a new improved social and employment centre, adjacent to the West Coast Mainline. The Town is desperate for a night time economy and the high street, particularly the north end, has lost its draw and footfall. If Stafford is to attract highly technical, green companies, it needs a Science and Technology park with mixed use and leisure facilities. This is a massive opportunity and could transform the town. On a smaller scale but similar to the Liverpool One development.**

Policy 12 (Other housing and employment land): **Yes**

Comments: **No reply**

Site Allocation Policies (continued)

Q5 - Do you agree with the proposed allocations?

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

Comments: **Green Space should be free and accessible to all. It is a proven factor in mental health and environmental and wildlife concerns are paramount.**

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

Comments: **The rivers in Stafford are under-developed as leisure spaces and are key in other comparable towns e.g. Shrewsbury to attract leisure and recreation use.**

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: Important to utilise existing designated industrial land and encourage SME's and entrepreneurial start-up businesses.

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: **Again, maximise the natural landscape for all. It's one of Stafford's assets and will draw in more families wishing to relocate from Cities.**

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? **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? **Yes**

Comments: **No reply**

Design and Infrastructure Policies

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

Comments: **Need to minimise the continued blight of low-level 'box' housing with very little space between. These are future slums in the making. Less density and design considerations will future-proof developments.**

Environment Policies

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

Comments: **No reply**

Connections

Q13 - Do you agree with policies? **Yes**

Comments: **Priority given to safe, well lit cycle lanes with separation from high-speed traffic. Free parking after 5.00pm would encourage a night-time economy.**

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 reply**

Comments: **No reply**

General Comments:

No reply

From: Parkin, Caroline (Corporate) [REDACTED]
Sent: 12 December 2022 11:00
To: Strategic Planning Consultations
Cc: [REDACTED]
Subject: RE: Stafford Borough Local Plan 2020-2040: Preferred Options consultation - FRM/2022/041 - SCC LLFA Response
Attachments: FRM_2022_041 SBC Local Plan 2020 to 2040_Preferred Options_LLFA Response.pdf; SBC Local Plan_Preferred Options Consultation_LLFA Site Assessment_20221212.xlsx

Good morning

Thank you for consulting us on the Stafford Borough Local Plan 2020-2040: Preferred Options. Please find attached our formal response along with LLFA comments regarding the proposed site allocations highlighting key flood risk issues likely to present constraints to development.

Note that we were unable to get the link in the original email to work for submitting our response, so have submitted by email. Please let us know if an alternative approach is required.

If you have any further queries, please do not hesitate to contact us.

Kind regards

Caroline



Caroline Parkin | Flood Risk Investigations & Projects Officer
Economy, Infrastructure and Skills

[REDACTED]
[REDACTED]
E-mail: [REDACTED]
www.staffordshire.gov.uk

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Lead Local Flood Authority Planning Application response

Lead SCC Officer	Caroline Parkin
Local Planning Authority	Stafford Borough Council
Planning application name	Stafford Borough Local Plan 2020-2040: Preferred Options consultation
Planning application reference	FRM/2022/041
Type of application	Strategic
Date consulted	19/10/2022
Date of response	12/12/2022

Disclaimer

This response is made by the County Council in its capacity as a Lead Local Flood Authority as a statutory consultee. As a Lead Local Flood Authority we respond to Planning Applications where resources allow and considering where development has the greatest ability to affect flood risk.

These comments should be taken as general comments on flood risk and drainage only. A detailed review of any technical methodology and results has not been undertaken by the Council. Liability for such technical work therefore rests with organisation(s) who have undertaken the said work.

General observations/ local flooding information

Flood Zone	N/a
Surface water risk	N/a
Past flooding	N/a
Watercourse within 5m of site	N/a
Other observations	Multiple proposed development allocations are presented within the documents provided which have been assessed individually (please refer to accompanying site assessment spreadsheet).



RESPONSE

Thank you for consulting us on the Stafford Borough Preferred Options Local Plan 2020-2040 report, our response is as follows:

Staffordshire County Council Flood Risk Management position:

Environment Policies Relevant to Flood Risk and SUDS:

We have reviewed the Local Plan and accompanying documents and feel that in general, the policies relevant to flood risk (Policy 42) and SUDs (Policy 43) are clear and recognise the key issues facing watercourses and drainage systems from future development within the Borough.

With regards to Policy 43 (Sustainable Drainage), the plan covers the key points outlined within Staffordshire County Council LLFA SUDS Handbook and on-line guidance presented on our website in relation to both national and local policy. We welcome the inclusion of links to our website page for developers and SUDS Handbook, which developers should refer to when preparing applications in relation to drainage design.

It should be noted that both the SUDS Handbook and the SCC Flood Risk Management Strategy are currently being updated and will be published on the LLFA website in the future. In terms of the SUDs Handbook the overriding principles of the document will remain the same but some amendments to the technical requirements of an FRA / Drainage Strategy are being updated. Developers should ensure that they are referring to the latest version of the SUDS Handbook when preparing evidence to be submitted as part of their Flood Risk Assessments and Drainage Strategies by consulting our web page.

Site Allocation Policies:

We have reviewed the site allocation policies presented within the plan (Policies 9, 10, 11, 12, 13, 14 and 15) and feel that they address key flood risk issues well, identifying opportunities throughout the Borough to minimise or reduce flood risk to both existing communities and future development, taking into account climate change.

Please refer to the accompanying spreadsheet for more detailed commentary on the Strategic Development Locations (Land North of Stafford and Land West of Stafford), Meecebrook Garden Community, Stafford Station Gateway and the proposed other housing, employment land and Gypsy and traveller accommodation allocations.

For larger more vulnerable sites where there is a potential constraint to development or it has been highlighted that there are opportunities to reduce flood risk both the new development and communities downstream, we would encourage developers to consult SCC LLFA and other relevant Risk Management Authorities (e.g. Environment Agency, Severn Trent Water Plc,



Sow and Penk Internal Drainage Board) at the earliest opportunity in the planning process.

We note that Policy 13 identifies areas of Local Green Space that are to be protected from development, but 'small buildings and structures which are ancillary to the primary use of the land may be acceptable within these areas. Whilst it is understood that major development is unlikely to be permitted in these areas, we have reviewed the locations and highlighted where potential issues may arise in relation to flood risk and drainage (Please refer to the accompanying spreadsheet).

Please contact us on [REDACTED] if you have any queries about this response.



Reference ID Code: 38; Staffordshire County Council, Flood Authority - Part C

Strategic Development Locations (SDL): Land North of Stafford & Land West of Stafford

Allocation Name	Eastin g	Northin g	Allocation Type	Current use	Watercourse(s)	Flood Zones	EA Risk of Flooding from Surface Water (RoFSW) Maps	Flooding Hotspot / Known Flooding Issues	Flood Risk Team Observations/Comments
North of Stafford	4E+05	326212	Strategic Development Location	Greenfield	Marston Brook Sandyford Brook Unnamed Drains	F21	RoFSW maps show several significant flow routes through the SDL and several areas of ponding within the site (1 in 30 year, 1 in 100 year and 1 in 1000 year maps).	Marston Brook and Sandyford Brook are high flood risk catchments with known flooding issues in downstream areas, particularly along Sandon Road.	<ul style="list-style-type: none"> *Marston Brook flows through central part of Strategic Development Location (SDL). Feeds into Sandyford Brook downstream of the SDL. Marston Brook and Sandyford Brook are high risk catchments and identified as particularly sensitive to increases in surface water runoff. Flooding hotspots in Sandon Road area downstream of SDL. Opportunities to alleviate flood risk downstream of the SDL through floodplain attenuation, on-site storage and the control of flow into existing watercourses should be sought. * Flood Risk Management scheme incorporating flood storage area has already been proposed to ensure reduction of flows and levels downstream. Existing Environment Agency hydraulic model of Sandyford Brook should be used to demonstrate there will be a reduction in flows downstream. Details of the proposed storage area should be submitted to the Environment Agency (EA) for approval. * Early engagement with EA and SCC LFA strongly recommended to ensure known constraints and SUDS are considered at the appropriate time, ahead of or as part of the production of preliminary development layout. * Detailed modelling of watercourses within the SDL required including consideration of the impacts of residual risk from culvert blockage. Appropriate easements required to ensure access for maintenance. * In line with Policy 9 of the SBC Local Plan surface water run off from sites should be less than greenfield run-off rates. * Several sections of watercourse appear to be culverted through the SDL. Where development is proposed adjacent to a culvert, locations should be confirmed with condition assessed and flood risk due to the asset assessed where appropriate. Opportunities to deculvert should also be sought. * Development should be directed away from identified flood risk areas. * Consult Severn Trent Water Plc regarding foul/sewer connection availability and point of connection/capacity
West of Stafford	4E+05	323181	Strategic Development Location	Greenfield	Dovey Brook	F22 and F23 within northern extent of site.	RoFSW maps show several flow routes through the SDL and several areas of ponding within SDL boundary.	Dovey Brook is identified as a high flood risk catchment with known flooding issues in downstream areas.	<ul style="list-style-type: none"> * Dovey Brook situated along the western and northern boundary of the SDL with large parts of the northern extent of the area located within F23 2 and 3. Where possible, new development should be directed to areas of lower risk. * Dovey Brook feeds into River Sow downstream and there are known flood risk issues downstream. Opportunities to alleviate flood risk downstream of the SDL through floodplain attenuation, on-site storage and the control of flow into existing watercourses should be sought. * Early engagement with EA (where appropriate) and SCC LFA strongly recommended to ensure known constraints and SUDS are considered at the appropriate time, ahead of or as part of the production of preliminary development layout. * Identified areas of surface water flood risk and flow paths through the site should be rationalised through development. * A number of existing ponds are located within the SDL boundary. A survey of drainage in the vicinity will be required and assessment of flood risk. * Where drains are culverted, locations should be confirmed with condition assessed and flood risk due to the asset assessed where appropriate. * Consult Severn Trent Water Plc regarding foul/sewer connection availability and point of connection/capacity.

Allocation Name	Eastin #	Northin #	Allocation Type	Current use	Watercourse(s)	Flood Zones	EA Risk of Flooding from Surface Water (RoFSW) Maps	Flooding Hotspot / Known Flooding Issues	Flood Risk Team Observations/Comments
Meecebrook Garden Community	4E-05	331500	Strategic Development Location	Greenfield	Meece Brook	FZ2 and FZ3	RoFSW maps show several significant flow routes through the proposed Garden Community area and several areas of ponding within the site (1 in 30 year, 1 in 100 year and 1 in 1000 year maps).	Marston Brook and Sandford Brook are high flood risk catchments with known flooding issues in downstream areas, particularly along Sandon Road.	<ul style="list-style-type: none"> * Meece Brook (Main River) flows in a south easterly direction within the northern extent of the site boundary with FZs 2 and 3 extending into parts of the site. Environment Agency should be consulted for development proposed adjacent to the Meece Brook. * Blockage scenarios may be required where Meece Brook is culverted beneath the railway. Need to assess any problems with railway culvert and culverts connecting to Meece Brook. * Unnamed ordinary watercourse flows through the central part of the site (near Baden Hall) flowing through a series of ponds before discharging into Meece Brook. * Where possible, new development should be directed to areas of lower risk. * Opportunities to alleviate flood risk downstream of the proposed development area through floodplain attenuation, on-site storage and the control of flow into existing watercourses should be sought. * Several drains within the site which appear to be culverted in places. Assessment of channel capacity and onward connectivity required. Where development is proposed adjacent to a culvert, locations should be confirmed with condition assessed and flood risk due to the asset assessed where appropriate. Opportunities to deculvert should also be sought. * Overland flow routes and land drainage features within the site. Flow routes should be rationalised through development. * A number of existing ponds are located within the boundary. A survey of drainage in the vicinity will be required and assessment of flood risk. * Early engagement with EA and SCC LLFA strongly recommended to ensure known constraints and SLUDS are considered at the appropriate time, ahead of or as part of the production of preliminary development layout. * Consult Severn Trent Water Plc regarding foul/sewer connection availability and point of connection/capacity.

Allocation Name	Eastin #	Northin #	Allocation Type	Current use	Watercourse(s)	Flood Zones	SA Risk of Flooding from Surface Water (RoFSW) Maps	Flooding Hotspot / Known Flooding Issues	Flood Risk Team Observations/Comments
Stafford Station Gateway	4E-05	322836	Strategic Development Location	Greenfield & brownfield	Dovey Drain	F22 and F23	RoFSW maps show risk of surface water flooding in parts of the site for the 1 in 30 year, 1 in 100 year and 1 in 1000 year maps, particularly in the eastern part of the site.	Previous reports of flooding along Newport Road (south eastern boundary of site).	<ul style="list-style-type: none"> * Dovey Drain (Ordinary watercourse) managed by the Sow and Penk Internal Drainage Board (IDB), flows through the site and is culverted in places. The IDB should be consulted. * Opportunities to deculvert the Dovey Brook should be investigated in line with Policy 11 of the SEC Local Plan. * Flood Zones 2 and 3 cover large parts of the site boundary. Development should be located to lower risk areas and the Environment Agency should be consulted for all developments proposed within Flood Zones 2 and 3. * Opportunities to alleviate flood risk downstream of the SDL through floodplain attenuation, on-site storage and the control of flow into existing watercourses should be sought. * Risk associated from blockage of culverted sections of Dovey Brook should be assessed where appropriate. * Existing balancing pond within the site boundary. Risk of flooding should be assessed for development proposed within the vicinity of the balancing pond. * RoFSW maps show areas of ponding within the site which should be rationalised through development. * Surface water and foul sewers run through parts of the site. Consult Severn Trent Water Plc to be confirm condition/capacity checked.

Allocation Ref.	Site Name	Eastin #	Northin #	Allocation Type	Area (ha)	Current use	Potential (ha)	Watercourse(s)	Flood Zone	LA Risk of Flooding from Surface Water (Designated Maps)	Flooding Hotspot / Known Flooding Issues	Flood Risk Team Comments	FRA Assessment	Consult
<p>Key</p> <p>OK in Principle - no significant flood risk concerns</p> <p>OK in Principle - minor flood risk concerns which should be rationalised or overcome through site</p> <p>OK in Principle - significant flood risk concerns (flood risk assessment will be required to demonstrate feasibility)</p> <p>Concerns it is not achievable - (flood risk assessment required to demonstrate deliverability)</p> <p>Unsuitable</p>														
STAFFORD														
STAFF001	Land at Ashfords	41-05	31957	Housing	12.76	Openfield	288	Pathways brook	F21	Some significant surface water flooding (up to 1 in 10 year and 1 in 100 year) covers large parts of site.	None identified from GIS.	* FRA required - Site >1ha and >10 dwellings proposed. * Pathways Brook (Ordinary watercourse) situated approx 50m to east of site boundary. Discharges into River Sow and Park. Associated FZs form boundary of site but do not encroach into site. * Pathways Brook culverted beneath railway to east of site. Blockage assessment required to confirm risk to site. * Possible foul sewer crossing adjacent to northern boundary of site. Consult Severn Trent Water PLC regarding foul/sewer connection availability and point of connection/capacity.	Yes	SECL/FA Environment Agency Sow and Park ICB
STAFF012	Stafford Police Station	41-05	32183	Housing	0.31	Openfield	13	None	F21	Minor surface water flooding to north of site (approx 10m from site) and to west of site (Appelwood Lane).	None identified from GIS.	* FRA required - >10 dwellings proposed. * Consult Severn Trent Water PLC regarding foul/sewer connection availability and point of connection/capacity.	Yes	SECL/FA
STAFF013	Former Staffordshire University Campus	41-05	32307	Housing	3.43	Openfield	98	Nearest watercourse Kingston Brook (30m to west of site boundary).	F21	Small isolated pockets of surface ponding within site (1 in 1000 year).	None identified from GIS.	* FRA required - Site >1ha and >10 dwellings proposed. * Minor risk of surface water flooding within northern and western parts of site that would be rationalised through development. * Consult Severn Trent Water PLC regarding foul/sewer connection availability and point of connection/capacity.	Yes	SECL/FA
STAFF014	MO24 site	41-05	32611	Housing	16.1	Openfield	395	Ordinary watercourse forming tributary of Marton Brook approx 120m to west of site.	F21	Potential overland flow path through central and eastern parts of site with 1 in 10 year, 1 in 100 year and 1 in 1000 year flood maps impacting site.	None within site identified from GIS. Known flooding problems downstream in Sarden Road area.	* FRA required - Site >1ha and >10 dwellings proposed. * Known flooding issues downstream in Sarden Road area associated with Tredford Brook. Seek opportunities to through floodplain alleviation, on-site storage and the control of flow into existing watercourses to alleviate flood risk downstream. * Significant areas of surface water flood risk within central and eastern parts of site. Potential overland flow route should be rationalised through the development and isolated area from potential flooding. * Review point in south eastern corner of site. * Consult Severn Trent Water PLC regarding foul/sewer connection availability and point of connection/capacity.	Yes	SECL/FA
STONE														
STONE001	Site Depot, Newcastle Road	41-05	33400	Housing	0.74	Openfield	18	River Trent	F21	1 in 1000 year map covers the northern part of the site.	None identified from GIS.	* Drainage strategy required - >10 dwellings proposed and surface water issues in northern part of site. Some parts of Newcastle Road to north of site shown to be at risk of surface water flooding (1 in 100 year). * Surface water sewer down to run through centre of site, discharging to River Trent. Consult Severn Trent Water PLC to be confirm condition/capacity check.	Yes	SECL/FA STW Environment Agency (River Trent along southern boundary of site)
STONE007	Land at Marlborough Road	41-05	33282	Housing	4.79	Openfield	101	None	F21	Yes	None identified from GIS.	* FRA required - Site >1ha and >10 dwellings proposed. * Consult Severn Trent Water PLC regarding foul/sewer connection availability and point of connection/capacity.	Yes	SECL/FA
STONE008 & STONE012	Land at Trent Road	41-05	33423	Housing	0.82	Openfield	20	River Trent 30m to south west of site.	F21	RAF SW maps follow similar extent to FZ maps and are located outside of the site boundary.	None identified from GIS.	* FRA & Drainage strategy required - >10 dwellings proposed and proximity to Trent Trent. * Site within FZ, but follows boundary of existing FZs for River Trent. * FRA should include outside of the site boundary. Risk of flooding from point needs to be assessed. * Consult Severn Trent Water PLC regarding foul/sewer connection availability and point of connection/capacity.	Yes	SECL/FA
STONE009	Land adjacent to Stone Police Station	41-05	33411	Housing	0.09	Openfield	3	None	F21	No	None identified from GIS.	* Minor development. * No significant risk of flooding identified from GIS. * Consult Severn Trent Water PLC regarding foul/sewer connection availability and point of connection/capacity.	No	
STONE011	Land east of Oakleigh Court	41-05	33301	Housing	6.26	Openfield	111	Adon Lodge Brook	F21	RAF SW maps largely follow Adon Lodge Brook (1 in 10 year, 1 in 100 year and 1 in 1000 year).	None identified from GIS within site. Flooding hotspot to east of site along Adon Lodge Brook (Historical highway flooding). Previous FRA for site to west identifies a property on Saddlestone which they are at risk of flooding and conformance from nearby residential areas contains heat retention flooding.	* FRA and Drainage strategy required - Site >1ha and >10 dwellings proposed. * FZs, but flood risk associated with Adon Lodge Brook which flows in a south westerly direction through central part of site as defined watercourse, becoming designated from there just inside western boundary of site at Blacker's Lane. * Will require assessment of flood risk and provision of easements for maintenance/cleanliness. * Adon Lodge Brook culverted downstream of site. Risk of flooding to site in event of blockage should be assessed. * Local Plan identifies opportunities for Natural Floodplain Management (NFM) interventions. * Foul sewer shown to cross through northern part of site. Easement will be required. * Consult Severn Trent Water PLC regarding foul/sewer connection availability and point of connection/capacity.	Yes	SECL/FA Environment Agency
STONE010	Land at Uttoxeter Road	41-05	33289	Housing	4.62	Openfield	97	None	F21	RAF SW maps show a flow route through the site which is associated with the existing ditch course crossing the site.	None identified from GIS.	* FRA required - Site >1ha and >10 dwellings proposed. * Existing ditch course / ordinary watercourse crossing the site from east to west to existing culvert beneath railway line. Additional ditch joining from south west. * Existing watercourses should be retained / cleared through the site as open channels and assessment undertaken as part of FRA to demonstrate adequate capacity to convey flow - up to the 1 in 100 year event also climate change generated by the actual catchment and adequate treatment. * Consult Severn Trent Water PLC regarding foul/sewer connection availability and point of connection/capacity.	Yes	SECL/FA
STOKE														
STOKE001	Bank Top Garage, Stafford Road	41-05	33610	Housing	0.28	Openfield	8	None	F21	RAF SW maps show minor risk along A533 to north of site (1 in 1000 year).	Previous reports of blockages within culvert to east of site. Lowland Primary School and its surface water flooding issues in fields to south of site.	* No watercourse identified within the site. Mapping shows a drain to the south of the site which discharges into the River Trent. Consult Severn Trent Water PLC regarding foul/sewer connection availability and point of connection/capacity. * Assessment of capacity and condition of drain required as route for surface water. * Foul water sewer shown to run through northern part of site. * Consult Severn Trent Water PLC regarding foul/sewer connection availability and point of connection/capacity.	No	Environment Agency
STOKE004	Land east of Stafford Road	41-05	33074	Housing	5.57	Openfield	100	None	F21	RAF SW maps show minor risk along Stafford road to north (1 in 1000 year).	None identified from GIS.	* FRA required - Site >1ha and >10 dwellings proposed. * Foul water sewer shown to run adjacent to northern boundary of the site. * Consult Severn Trent Water PLC regarding foul/sewer connection availability and point of connection/capacity.	Yes	SECL/FA
WOODRAYS														
WOOD001	Storage off A520	41-05	31488	Housing	0.06	Openfield	1	None	F21	RAF SW maps show minor risk along A520 to south of site (1 in 1000 year).	None identified from GIS.	* No obvious watercourse/streams nearby. Consult Severn Trent Water PLC regarding foul/sewer connection availability and point of connection/capacity. * NB. Site to be built in connection with Site 017 (see comments below).	No	Severn Trent Water PLC
WOOD010	Land adjacent to The Cosh	41-05	32187	Housing	1.2	Openfield	21	Unnamed drain from north, internal through site leading into unnamed watercourse at south western corner of site. Discharges into Stonehouse Union Canal approx 50m to west of site.	F21	RAF SW maps show risk of flooding along transport flood along western boundary of site. 1 in 10 year and 1 in 100 year maps show risk of flooding to property downstream of site.	None identified from GIS.	* FRA required - Site >1ha and >10 dwellings proposed. * Unnamed ordinary watercourse potentially culverted through site using an open channel at south western corner of site before entering culvert. Assessment of condition, capacity and overall connectivity of culvert required. * FRA should include assessment of risk of blockage from culvert. * Consider opportunities for deculverting watercourse. * Note potential development located within site (MG13). * Foul sewer shown along northern boundary of site. * Consult Severn Trent Water PLC regarding foul/sewer connection availability and point of connection/capacity.	Yes	SECL/FA Canals and Rivers Trust
WOOD011	Land off A520 opposite SOAD1	41-05	32189	Housing	0.17	Openfield	3	None	F21	RAF SW maps show risk (1 in 10 year and 1 in 100 year) along Newport Road at access point to site.	None identified from GIS.	* Foul sewer shown through western part of site. Easement will be required adjacent to line of sewer. * Non-obvious watercourse/streams nearby. Consult Severn Trent Water PLC regarding foul/sewer connection availability and point of connection/capacity.	No	Severn Trent Water PLC
WOOD013	Land to rear of Woodhouses School	41-05	32036	Housing	4.9	Openfield	88	Drain situated along eastern boundary of the site. Culverted beneath Dicky's Lane and continues to south west towards site WOOD10.	F21	Minor surface water ponding within site (1 in 1000 year).	None identified from GIS.	* FRA required - Site >1ha and >10 dwellings proposed. * Drain situated along eastern boundary of site. Assessment of condition, capacity and confirmation of overall connectivity required. * Note potential development downstream (MG10). * Consult Severn Trent Water PLC regarding foul/sewer connection availability and point of connection/capacity.	Yes	SECL/FA
WOOD017	Land off Maccles Lane	41-05	32002	Housing	0.18	Openfield	5	None	F21	None identified from GIS.	None identified from GIS.	* No obvious watercourse/streams nearby. Consult Severn Trent Water PLC regarding foul/sewer connection availability and point of connection/capacity.	No	Severn Trent Water PLC

Staffordshire County Council Lead Local Flood Authority (LLFA) - Site Allocation Comments

Key
Ok in Principle - no significant flood risk concerns
Ok in Principle - minor flood risk concerns (which should be rationalised or overcome through site)
Ok in Principle - significant flood risk concerns (flood risk assessment will be required to demonstrate)
Concerns it is not achievable (flood risk assessment required to demonstrate deliverability)
Unsuitable

Allocation Ref.	Site Name	Eastng	Northing	Allocation Type	Area (ha)	Current use	Potential yield (no.)	Watercourse(s)	Flood Zones	EA Risk of Flooding from Surface Water (RoFSW) Maps	Flooding Hotspot / Known Flooding Issues	Flood Risk Team Comments	FRA Required?	Consult
STAFFORD														
0900	Land to the north of Redhill	390083	326997	Employment	3.15	Greenfield	N/A	Bullockcroft Brook along eastern boundary discharging into River Sow to south west	F21	RoFSW maps show flow path through northern and eastern part of site (associated with Bullockcroft Brook) (1 in 30 year, 1 in 100 year and 1 in 1000 year). Surface water flow path shown within western part of site with possible culvert beneath M6. Several isolated areas of surface water ponding within site.	None identified from GIS.	* FRA & Drainage Strategy required. * Bullockcroft Brook situated along eastern boundary of site. RoFSW maps associated with water course but not clearly mapped. Survey should be undertaken to demonstrate watercourse has sufficient capacity for proposed discharge rates and volumes. Greenfield runoff rates should not be exceeded. * Provision of easement along watercourse required for maintenance/access. * Surface water flow paths should be rationalised through development. * Watercourse(s) culverted beneath M6 presenting risk of blockage which should be assessed. Culvert capacity and onward connectivity should also be confirmed. * Existing pond in south eastern corner of site * Watercourse assessment likely to be required to ensure sufficient capacity for proposed discharge rates. * No obvious sewers nearby. Consult Severn Trent Water Plc regarding foul/sewer connection availability and point of connection/capacity.	Yes	SCC LLFA
SEIGHFORD														
0803	Land to the east of Ladfordfield	386389	326143	Employment	5.61	Greenfield	N/A		F21	RoFSW maps do not affect the site.	None identified from GIS.	* FRA & Drainage Strategy required. * No watercourses identified within the site. GIS mapping shows an unnamed culverted watercourse to the south of the site. The exact alignment of this culvert is unknown. * There are several ponds which will need investigating to determine if additional drainage is present on site. * Consult Severn Trent Water Plc regarding foul/sewer connection availability and point of connection/capacity.	Yes	SCC LLFA

Staffordshire County Council Lead Local Flood Authority (LLFA) - Site Allocation Comments

Key	
 	OK in Principle - no significant flood risk concerns
 	OK in Principle - minor flood risk concerns (which should be rationalised or overcome through site design)
 	OK in Principle - significant flood risk concerns (flood risk assessment will be required to demonstrate feasibility)
 	Concerns it is not achievable - (flood risk assessment required to demonstrate deliverability)
 	Unsuitable

Allocation Ref.	Site Name	Easting	Northing	Allocation Type	Area (ha)	Current use	Potential yield (no.)	Watercourse(s)	Flood Zones	EA Risk of Flooding from Surface Water (RoFFSW) Maps	Flooding Hotspot / Known Flooding Issues	Flood Risk Team Comments	FRA Required?	Consult
STAFFORD														
SDP1	Land to north of Hopton Lane	35438	32696	Gypsy and Traveller Accommodation	1.00	Greenfield	at least 15		F21	RoFFSW maps do not impact on the site. Isolated pockets of ponding to the north east of site (1 in 30 year, 1 in 100 year, 1 in 3000 year) and to west and east of site (outside of the boundary).	None identified from GIS.	* FRA required due to size of site and no. proposed dwellings. * No obvious watercourses/sewers nearby. Consult Severn Trent Water PLC regarding foul/sewer connection availability and point of connection/capacity.	Yes	SCC LFA
NEAR WESTON														
SDP2	Land south of Wadden Lane	39830	32785	Gypsy and Traveller Accommodation	0.42	Greenfield	at least 10		F21	RoFFSW maps cover much of the south western part of the site (1 in 30 year, 1 in 100 year and 1 in 1000 year). Potential flow path from north.	None identified from GIS.	* FRA required due to no. proposed dwellings and surface water issues to address. * Risk of surface water flow entering site from north of Wadden Lane and ponding within site. * No obvious watercourses/sewers nearby. Consult Severn Trent Water PLC regarding foul/sewer connection availability and point of connection/capacity.	Yes	SCC LFA

Staffordshire County Council Lead Local Flood Authority (LLFA) - Site Allocation Comments

Key
OK in Principle - no significant flood risk concerns
OK in Principle - minor flood risk concerns (which should be rationalised or mitigated through the design)
OK in Principle - significant flood risk concerns (flood risk assessment will be required to demonstrate feasibility)
Concerns if it is not achievable - (flood risk assessment required to demonstrate deliverability)
Unsuitable

Allocation Ref.	Site Name	Eastng	Northng	Allocation Type	Area (ha)	Current use	Potential (ha)	Watercourse(s)	Flood Zones	LA Risk of Flooding from Surface Water (RoFSW) Maps	Flooding Hotspot / Known Flooding Issues	Flood Risk Team Comments	FRA Required?	Consult
STAFFORD														
SS-PO-01	Land off Falmouth Avenue	39512	321916	Local Green Space	5.34	Local Green Space	N/A		F21	RoFSW maps show several surface water flow paths through the site in a northerly direction. Possible culverts beneath Check SCALGO for surface water flow path.	None identified from GIS.	* FRA required - site x3ha. * RoFSW maps show several surface water flow paths through the site which should be kept clear and retained.	Yes	SCC LLFA
SS-PO-02	Coppice and Playground at Bluebell Hollow	395091	321370	Local Green Space	0.82	Local Green Space	N/A		F21	RoFSW maps show surface water flood risk in eastern part of site (1 in 30 year, 1 in 100 year and 1 in 1000 year).	None identified from GIS.	* FRA required - surface water issues to address. * RoFSW maps show significant risk of surface water flooding both within site and to property upstream. Existing surface water flow paths should be retained and kept clear to ensure flow paths are not obstructed. * STW surface water sewer through eastern part of site (possibly a culverted watercourse). Ensure sufficient easement from sewer for access and maintenance.	Yes (see comments)	SCC LLFA
SS-PO-03	Holly Bush Field and Coppice	395117	320723	Local Green Space	0.36	Local Green Space Recreation Ground	N/A		F21	RoFSW maps do not cover the site.	None identified from GIS.	* No watercourses within or adjacent to site.	No	
SS-PO-07	Playing field at Dosey (Same as SS-PO-14)	396082	323417	Local Green Space	1.91	Local Green Space Recreation Ground	N/A	Dosey Drain	F22	RoFSW maps show isolated pocket of surface water flooding within site for both the 1 in 100 year and 1 in 1000 year maps.	None identified from GIS.	* FRA required - Site in F22 and x3ha. * Kingston Brook (Main River) flows through the centre of the site. Flood Zones 2 and 3 cover large parts of the site. * Open water feature within site, possibly connected to Dosey Drain. Condition, capacity and onward connectivity from site would need to be investigated. * STW surface water sewer located within eastern extent of site, and foul sewer crosses the north eastern corner of the site. Consult Severn Trent Water Plc regarding foul/sewer connection availability and point of connection/capacity.	Yes	Environment Agency SCC LLFA
SS-PO-08	Play area at Melbourne Crescent	393937	324109	Local Green Space	0.62	Local Green Space Recreation Ground	N/A	Kingston Brook	F22 & F23	RoFSW maps generally follow the line of the Kingston Brook through the central part of the site (1 in 30 year, 1 in 100 year and 1 in 1000 year maps).	None identified from GIS.	* FRA required - Site in F22 and F23. * Kingston Brook (Main River) flows through the centre of the site. Flood Zones 2 and 3 cover large parts of the site. * Areas identified as being at risk from surface water flooding should be retained. * Several STW surface water sewers run through the site and discharge into the watercourse. * STW foul sewers situated within southern and northern extents of the site. * Consult Severn Trent Water Plc regarding foul/sewer connection availability and point of connection/capacity.	Yes	Environment Agency SCC LLFA
SS-PO-09	Play park at Barnard Square	393604	324205	Local Green Space	0.31	Local Green Space	N/A		F21	RoFSW maps do not extend into the site, surface water flow paths shown on Barnard Square to the west of the site.	None identified from GIS.	* STW surface water sewer, situated within the northern and southern parts of the site. * Consult Severn Trent Water Plc regarding foul/sewer connection availability and point of connection/capacity.	No	STW Plc
SS-PO-10	Land south of Stafford Common	391807	324787	Local Green Space	6.48	Local Green Space	N/A	Sandyford Brook	F21	RoFSW maps show areas at risk from surface water flooding within the site (1 in 30 year, 1 in 100 year and 1 in 1000 year maps).	None identified from GIS.	* FRA required - Site x3ha. * Sandyford Brook (Ordinary watercourse) culverted through central part of site. * Provision of easement along culverted watercourse required for maintenance/access. * Avoid development above or adjacent to culverted watercourse and within areas identified as being at risk from surface water flooding. * Sandyford Brook discharges into Marston Brook. Several flooding hotspots associated with Marston Brook downstream of site.	Yes	SCC LLFA
SS-PO-11	Playing park and field at St. George's Meadows	392174	323665	Local Green Space	1.49	Local Green Space Playing field	N/A	Sandyford Brook	F21	RoFSW maps show small areas of ponding within the southern part of the site (1 in 30 year, 1 in 100 year and 1 in 1000 year).	None identified from GIS.	* FRA required - Site x3ha. * Sandyford Brook situated along southern boundary of site. * Provision of easement along culverted watercourse required for maintenance/access.	Yes	Environment Agency
SS-PO-12	Land at St. George's Meadows	392486	322707	Local Green Space	0.10	Local Green Space	N/A	No watercourses within or adjacent to site.	F21	RoFSW maps do not extend into the site.	None identified from GIS.	* No significant flood risk issues.	No	
SS-PO-14	Land known as "Football ground" at Dosey (Same as SS-PO-07)	396082	323417	Local Green Space	1.91	Local Green Space Recreation Ground	N/A	Dosey Drain	F22	RoFSW maps show isolated pocket of surface water flooding within site for both the 1 in 100 year and 1 in 1000 year maps.	None identified from GIS.	* FRA required - majority of site located within F22 and x3ha. * Kingston Brook (Main River) flows through the centre of the site. Flood Zones 2 and 3 cover large parts of the site. * STW surface water sewer located within eastern extent of site, and foul sewer crosses the north eastern corner of the site. Consult Severn Trent Water Plc regarding foul/sewer connection availability and point of connection/capacity.	Yes	Environment Agency SCC LLFA
SS-PO-16	Land at Henbury Road	392011	323024	Local Green Space	2.81	Local Green Space Playing field	N/A	No watercourses within or adjacent to site.	F21	RoFSW maps show some risk to west of site boundary adjacent to Health Centre (1 in 30 year, 1 in 100 year and 1 in 1000 year).	None identified from GIS.	* No significant flood risk issues. * STW surface water sewer located along northern boundary of site. Consult Severn Trent Water Plc regarding foul/sewer connection availability and point of connection/capacity.	No	Severn Trent Water Plc
SS-PO-17	Land south of County Hospital	393631	323854	Local Green Space	2.02	Local Green Space	N/A	No watercourses within or adjacent to site.	F21	RoFSW maps show minor flooding in south western and western extent of site.	None identified from GIS.	* FRA required - site x3ha. * No significant flood risk issues.	Yes	SCC LLFA
STONE														
SS-PO-18	Land at Sashgate Drive	391299	323562	Local Green Space	0.92	Local Green Space	N/A	Acton Lodge Brook	F22 & F23	RoFSW maps extend into large parts of site and follow river/Acton Lodge with minor risk also shown through eastern and southern parts of site.	None identified from GIS.	* FRA required - Site located in F22 and F23. * Acton Lodge Brook flows through site. Culverted brook channel or south western point of site. Assessment may be required to determine condition of culvert and any issues regarding blockage. * F22 and F23 cover large parts of the site. Development within these areas must be appropriate for the level of risk. * Areas of surface water flood risk will need to be taken account of and rationalised as part of any development. * STW foul and surface water sewers situated within the site. Consult Severn Trent Water Plc regarding foul/sewer connection availability and point of connection/capacity.	Yes	Environment Agency
WOODSEAVE														
SS-PO-15	Land adjacent to Woodseaves Primary Academy	380184	325517	Local Green Space	0.52	Local Green Space Playing field	N/A	No watercourses within or adjacent to site.	F21	RoFSW maps do not extend into the site.	None identified from GIS.	* No significant flood risk issues. * Note potential housing development to north (PH213)	No	
WESTON														
SS-PO-04	The Green	391679	326309	Local Green Space	1.76	Local Green Space Recreation Ground	N/A	No watercourses within or adjacent to site.	F21	RoFSW maps show areas of surface water flood risk (1 in 1000 year).	None identified from GIS.	* FRA required - site x3ha. * Areas of surface water flood risk will need to be taken account of and rationalised as part of any development. * STW foul sewers situated within the site. Consult Severn Trent Water Plc regarding foul/sewer connection availability and point of connection/capacity.	Yes	SCC LLFA STW plc
AOBASTON														
SS-PO-05	Land in the centre of Aobaston	376320	327813	Local Green Space	1.93	Local Green Space	N/A	No watercourses within or adjacent to site.	F21	RoFSW maps show significant areas of surface water flooding within northern part of site with flow route towards properties to west of site boundary (1 in 30 year, 1 in 100 year and 1 in 1000 year).	None identified from GIS.	* FRA required - site x3ha and surface water issues. * Areas of surface water flood risk will need to be taken account of and rationalised as part of any development. Opportunities to reduce risk of flooding to properties to west of site boundary should be considered as part of any future development.	Yes	SCC LLFA
BARLASTON														
SS-PO-06	Land at Longton Road	399010	328463	Local Green Space	1.11	Local Green Space	N/A	No watercourses within or adjacent to site.	F21	RoFSW maps show flow route to western part of site.	None identified from GIS.	* FRA required - site x3ha. * Areas of surface water flood risk will need to be taken account of and rationalised as part of any development. * STW combined sewer within site. Consult Severn Trent Water Plc regarding foul/sewer connection availability and point of connection/capacity.	Yes	SCC LLFA STW plc
CROXTON														
SS-PO-06	Coppice and Playground in Croxton	378604	331246	Local Green Space	0.38	Local Green Space	N/A	Unnamed ordinary watercourse	F21	RoFSW maps do not extend into the site.	None identified from GIS.	* Unnamed ordinary watercourse issues at north eastern corner of site, flowing in a northerly direction away from site boundary. * No significant flood risk issues.	No	
FARNFIELD														
SS-PO-13	Land in the centre of Farnfield	386087	332529	Local Green Space	1.96	Local Green Space	N/A	Farnfield Brook (Main River)	F22	RoFSW maps show flow path through the site with areas of surface water flood risk in northern, central and eastern extents of the site (1 in 30 year, 1 in 100 year and 1 in 1000 year). Significant risk of flooding along Farnfield Lane to north of site boundary.	None identified from GIS.	* FRA required - Site located in F22 and x3ha. * Farnfield Brook (Main River) flows through western extent of site. * Site located within F22 (possible misalignments in Flood Maps). FRA required. * Consult Environment Agency. * Farnfield Brook culverts through northern part of site. * Development should be avoided in areas identified at risk of flooding. Provision of easement along watercourse required for maintenance/access. * STW foul and surface water sewers situated within central and northern extents of the site. Consult Severn Trent Water Plc regarding foul/sewer connection availability and point of connection/capacity.	Yes	Environment Agency SCC LLFA STW Plc

From: Croshaw, Laura (E,I&S) [REDACTED]
Sent: 12 December 2022 10:27
To: Strategic Planning
Cc: [REDACTED]
Subject: Staffordshire County Council Mineral and Waste Response

Please see below Staffordshire County Council's Mineral and Waste Response to Stafford Borough's Local Plan Preferred options

Meecebrook Garden Community - Policy 7: Meecebrook site allocation and Policy 8: Master planning and design at Meecebrook:

We have previously referred to the proximity of the Garden Community to Meece Landfill, a hazardous waste site which is specifically safeguarded by Policy 2.4 of the [Staffordshire and Stoke-on-Trent Joint Waste Local Plan](#). The landfill is permitted to operate until 2035 (ref. [S.15/12/403 W](#)). With this in mind, it was noted that Policy 2.5 of the Waste Local Plan requires proposals for non-waste related development in the vicinity of permitted waste management facilities, should not unduly restrict or constrain the activities permitted at the waste management facility.

Having regard to the 'Vision Document' for the Meecebrook proposal, the boundary of the proposal is shown separated from the boundary of the waste management facility which may address our previous concerns. We would recommend, however, that in preparing the 'Framework Masterplan Supplementary Planning Document' (SPD) the development principles for the Community proposals take into account safeguarding policies for permitted waste management facilities including Meece Landfill. In addition, the proposals for the Community overlap with Mineral Safeguarding Areas and development principles will need to take into account the mineral safeguarding requirements of Policy 3 of the [Minerals Local Plan](#).

Regards

Laura Croshaw



Laura Croshaw

Planning and Enabling Officer
Economy, Infrastructure & Skills

[REDACTED]

Tel: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED]

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From: Palmer, Lynsey L (Corporate) [REDACTED]
Sent: 09 December 2022 12:48
To: Strategic Planning Consultations
Subject: SCC Property Response to Preferred Options Consultation
Attachments: SBC PREFERRED OPTIONS CONSULATION - DEC 22 - SCC PROPERTY RESPONSE.pdf

Good Afternoon

Please find attached SCC Property response in respect of the above Consultation.

In addition please note we are currently reviewing our Sites and note that some previously submitted sites have not been included in the preferred options, we will be submitting these shortly for your consideration.

If you require any further information please do not hesitate to contact me.

Kind Regards

Lynsey



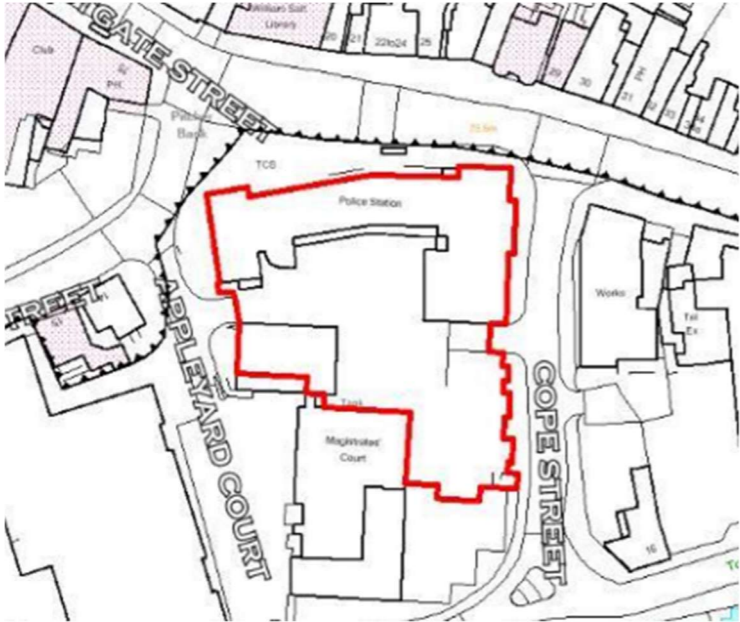
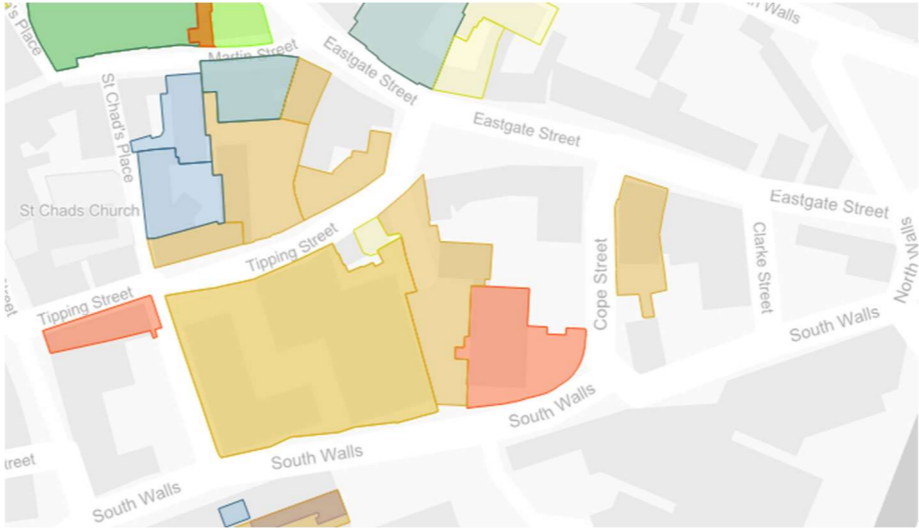

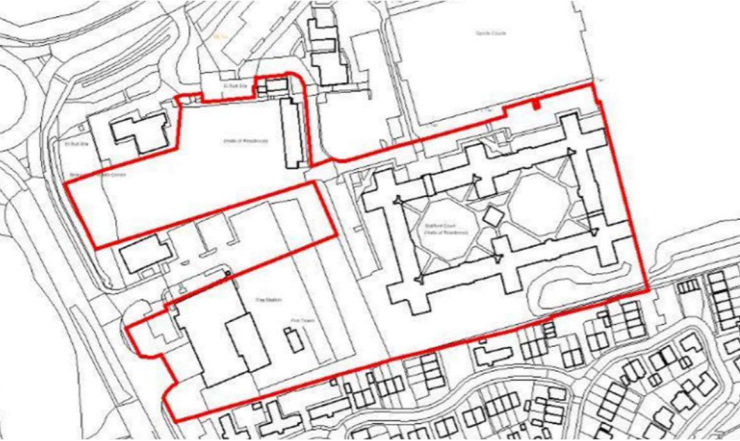
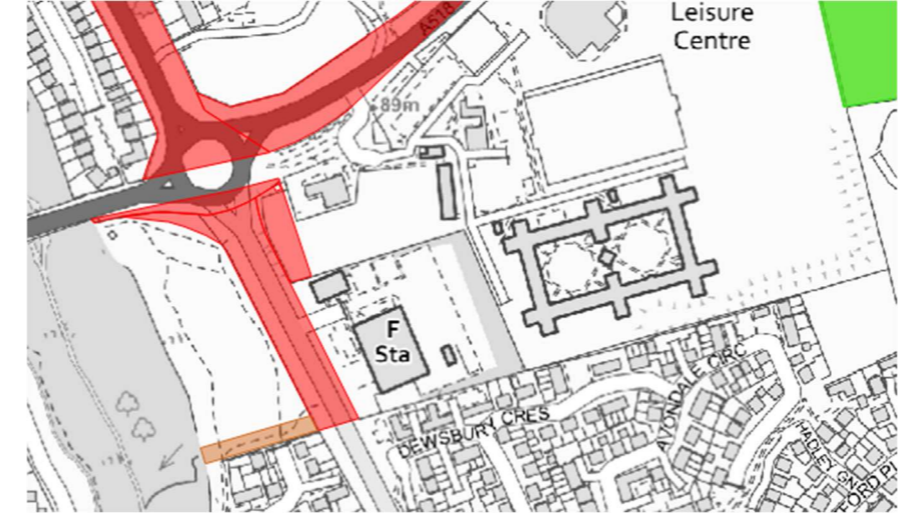
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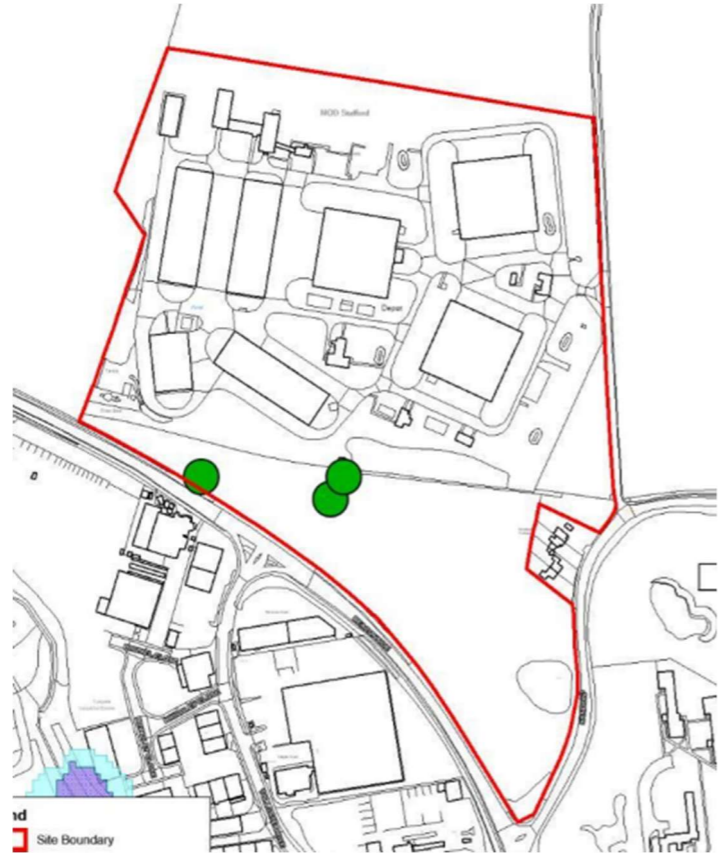


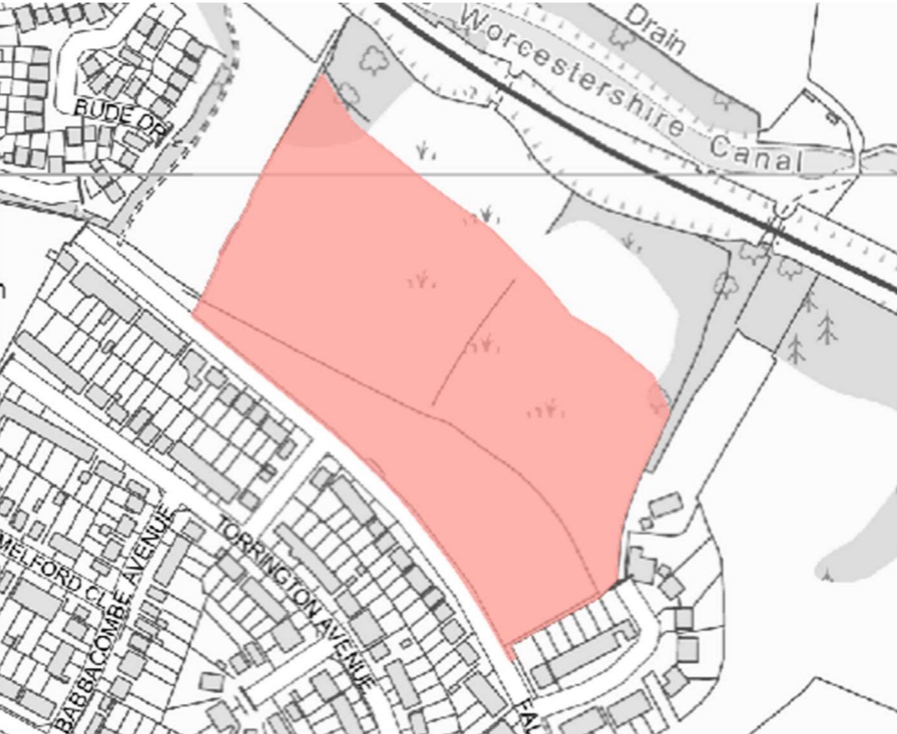
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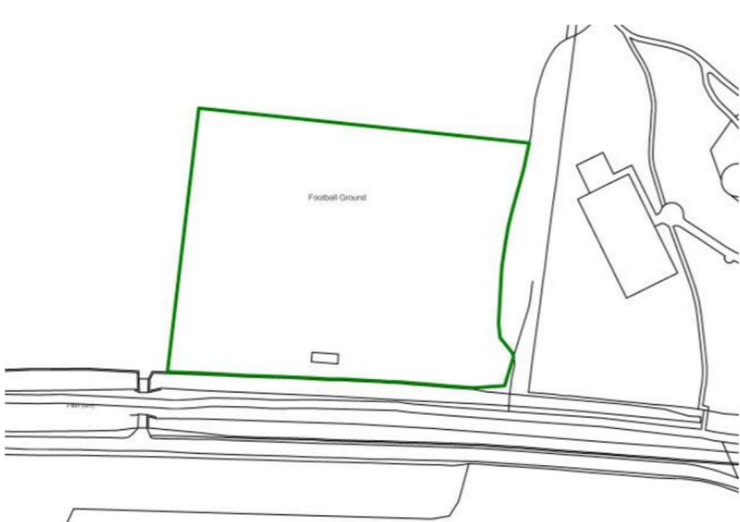
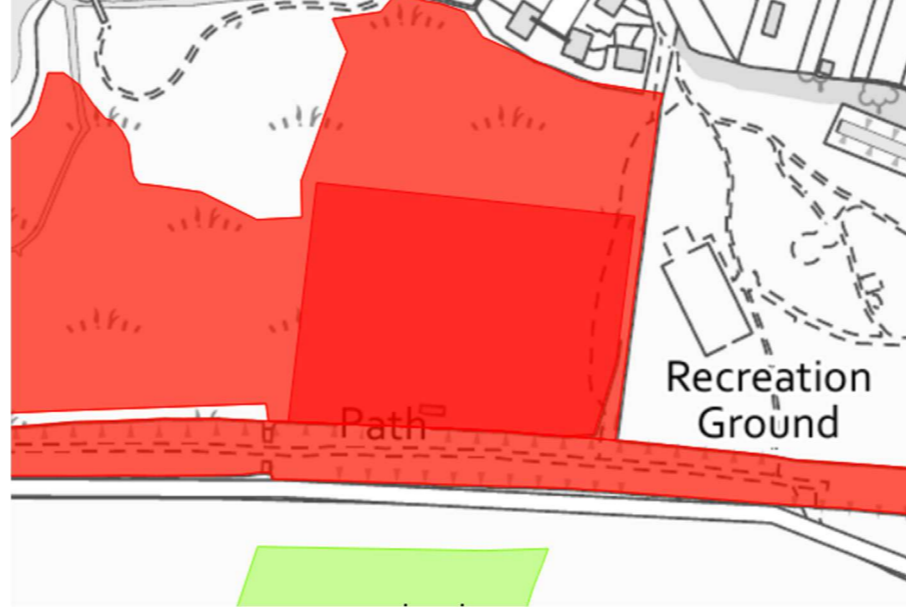


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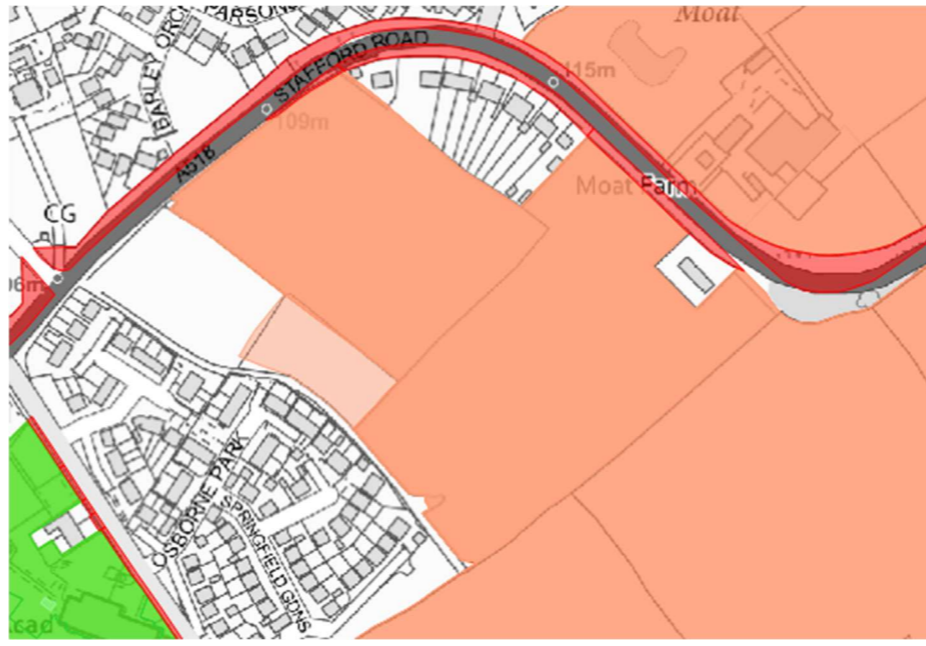
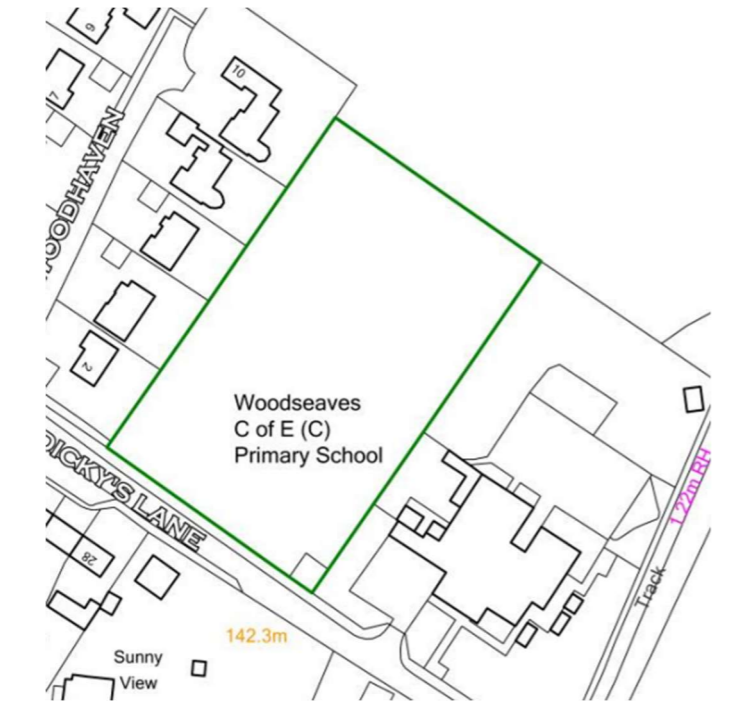

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PAGE NO AND SBC REF/POLICY	SBC PLAN	SCC PLAN	SCC RESPONSE/COMMENTS
<p>Site ID: STAFMB12 Site Name: Stafford Police Station Settlement: Stafford Site Area (ha): 0.31 Land Use: Housing Potential Yield: 13 dwellings</p> <p>Pg 133-134</p> <p>POLICY 12. Other housing and employment land allocations</p>			<p>Please note the area indicated in red in your plan contains land within SCC Title (PID 7192 - Appleyard Court Offices).</p> <p>SCC Property request that the following 2 Title Parcels are taken into consideration/inclusion within your potential housing allocation going forward:</p>  <p>A formal submission will follow in due course.</p>
<p>Site ID: HOP03 Site Name: Former Staffordshire University Campus Settlement: Stafford Site Area (ha): 3.43 Land Use: Housing Potential Yield: 98 dwellings</p> <p>Pg 135-136</p> <p>POLICY 12. Other housing and employment land allocations</p>			<p>Please note SCC Highway Title included within your red edge and land within these areas should not be included in the allocation.</p> <p>Please amend area omitting SCC Title Terrier Number T4475.</p>

<p>Site ID: HOP08 Site Name: MOD 4 Site Settlement: Stafford Site Area (ha): 16.1 Land Use: Housing Potential Yield: 396 dwellings</p> <p>Pg 137-138</p> <p>POLICY 12. Other housing and employment land allocations</p>			<p>Please note several SCC Highway Titles within your red edge and land within these areas should not be included in the allocation.</p> <p>Please amend area omitting SCC Title Terrier Numbers T3737A, T4154H and T4154M.</p>
<p>Site ID: LGS.PO.01 Site Name: Land off Falmouth Avenue Settlement: Stafford Site Area (ha): 5.343 Land Use: Local Green Space Potential Yield: N/A</p> <p>Pg 141-142</p> <p>POLICY 13. Local green space</p>			<p>SCC OBJECT to the inclusion of the land within SCC Title (PID 4597 - Education Land (Falmouth Avenue)) shown in red as Local Green Space.</p> <p>Whilst SCC has put this site forward previously to be included in Housing allocation the site has been recently reviewed to also address possible future service need.</p> <p>SCC Property request that the parcel shown in red on our plan is not allocated as LGS but taken into consideration/inclusion for the following potential uses:</p> <ul style="list-style-type: none"> • Residential • Elderly/Nursing Care • Children’s Residential <p>A formal submission will follow in due course.</p>

<p>Site ID: LGS.PO.07 Site Name: Playing field at Doxey Settlement: Stafford Site Area (ha): 1.948 Land Use: Local Green Space Potential Yield: N/A</p> <p>Pg 147-148</p> <p>POLICY 13. Local green space</p>			<p>Please note SCC Land Titles as follows:</p> <ul style="list-style-type: none"> • Land to the South of the site: <ul style="list-style-type: none"> ○ PID 5336 - Stafford to Newport Greenway ○ Highways Terrier T1729 • Land to the West of the site: <ul style="list-style-type: none"> ○ PID 7431 - Land at Doxey Road & South Western Access Road ○ Highways Terrier T5417H <p>Please ensure the allocation for this site does not include any land within these titles.</p>
<p>Site ID: LGS.PO.11 Site Name: Playing park and field at St. George's Mansions Settlement: Stafford Site Area (ha): 1.425 Land Use: Local Green Space Potential Yield: N/A</p> <p>Pg 155-156</p> <p>POLICY 13. Local green space</p>			<p>Please note a SCC Title within your red edge (Highway and Right of Way T4609H) and land within these areas should not be included in the allocation.</p> <p>Please amend area omitting SCC Title Terrier</p>

<p>Site ID: LGS.PO.14 Site Name: Land known as "football ground" at Doxey Settlement: Stafford Site Area (ha): 0.9405 Land Use: Local Green Space Potential Yield: N/A</p> <p>Pg 159-160</p> <p>POLICY 13. Local green space</p>			<p>Site is within SCC Ownership –</p> <ul style="list-style-type: none"> • PID 7431 - Land at Doxey Road & South Western Access Road • Highways Terrier T5417H <p>Please contact [REDACTED] regarding allocation:</p> <p>[REDACTED]</p>
<p>Site ID: LGS.PO.16 Site Name: Land at Merrey Road Settlement: Stafford Site Area (ha): 0.8563 Land Use: Local Green Space Potential Yield: N/A</p> <p>Pg 161-162</p> <p>POLICY 13. Local green space</p>			<p>SCC Property OBJECT to the inclusion of the land as Local Green Space within SCC Title (PID 936 - Rising Brook Library) shown in red on our plan.</p>

<p>Site ID: GNO04 (west) Site Name: Land east of Stafford Road Settlement: Gnosall Site Area (ha): 5.57 Land Use: Housing Potential Yield: 100 dwellings</p> <p>Pg 184-185</p> <p>POLICY 12. Other housing and employment land allocations</p>			<p>Land is within SCC Title (PID 2825 - Manor Farm Estate - Holding No. 5). SCC Property welcome its inclusion as housing allocation.</p> <p>Please note SCC Highway Titles bordering the site:</p> <ul style="list-style-type: none"> • T456 • T3448 • T4378L/G/K/HT3448
<p>Site ID: LGS.PO.15 Site Name: Land adjacent to Woodseaves Primary Academy Settlement: Woodseaves Site Area (ha): 0.5164 Land Use: Local Green Space Potential Yield: N/A</p> <p>Pg 197-198</p> <p>POLICY 13. Local green space</p>			<p>The freehold owner of the playing field is Staffordshire County Council (PID 258 - Woodseaves CE(VC) Primary School) and the land is leased for 125 years to the School by way of an Academy lease.</p> <p>The playing field is owned by Staffordshire County Council as an Education Asset specifically for the use of the School and should not be included in this neighbourhood plan for use as Local Green Space and the land should, in the local plan, be designated for education purposes only.</p> <p>The land is also protected by S77 which controls its change of use and land disposal.</p> <p>It should be noted that the playing field is fenced and if this is being used by anyone other than the Academy they are doing so as trespassers.</p>

SBC PREFERRED OPTIONS CONSULTATION OCT TO DEC 2022 – SCC PROPERTY RESPONSE

<p>Site ID: LGS.PO.04 Site Name: The Green Settlement: Weston Site Area (ha): 1.7 Land Use: Local Green Space Potential Yield: N/A</p> <p>Pg 218-219</p> <p>POLICY 13. Local green space</p>			<p>Please note SCC Highway Titles bordering the site: T3917 and land within these areas should not be included in the allocation.</p>
<p>Site ID: GAY02 Site Name: Land south of Wadden Lane Settlement: Near Weston Site Area (ha): 0.45 Land Use: Gypsy and Traveller Accommodation Potential Yield: At least 10 pitches</p> <p>Pg 206-207</p> <p>POLICY 30. Gypsy and traveller accommodation</p>			<p>Please note SCC Highway Title shown in red on our plan and land within these areas should not be included in the allocation.</p>

From: Preferred Options Consultation [REDACTED]
Sent: 12 December 2022 11:36
To: Strategic Planning Consultations
Subject: Preferred Options Consultation - Submitted Response

Full name: **Tracey Kellner**

Email: [REDACTED]

Statutory Bodies and Stakeholders

Organisation or Company: **Staffordshire County Council, School Organisation Team**

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: **Any approach taken should ensure there is appropriate education infrastructure either through existing or new provision.**

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

Comments: **Any approach taken should ensure there is appropriate education infrastructure either through existing or new provision.**

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

Comments: **Any approach taken should ensure there is appropriate education infrastructure either through existing or new provision.**

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

Comments: **Any approach taken should ensure there is appropriate education infrastructure either through existing or new provision.**

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

Comments: **Any approach taken should ensure there is appropriate education infrastructure either through existing or new provision.**

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

Comments: **Any approach taken should ensure there is appropriate education infrastructure either through existing or new provision.**

Meecebrook Garden Community

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

Comments: **The Preferred Options Consultation indicates that a new Garden Community at Meecebrook would deliver 3,000 new homes over the local plan period to 2040, and a further 3,000 new homes beyond the plan period. This level of housing (3,000 dwellings) would be expected to generate 630 primary school aged pupils, 450 secondary school aged pupils and 90 post-16 aged pupils. The further 3,000 dwellings (6,000 dwellings total) would in the longer term generate 1,260 primary aged pupils, 900 secondary aged pupils and 180 post-16 aged pupils. We have previously advised that a minimum of 5,000 new homes would be required to ensure the required new secondary is viable. We would expect the Local Plan to include reference to a local delivery model that could deal with front-loading and managing the infrastructure transition from early years, through to primary, secondary and post-16 provision. This may include using All Through School models to provide this flexibility and in conjunction with a complementary travel plan that would consider the school transport impacts over the two plan periods associated with the build out rate. This should be considered in the context of Paragraph 73 of the NPPF (copied below): “The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should: (a) consider the opportunities presented by existing or planned investment in infrastructure, the area’s economic potential and the scope for net environmental gains; (b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access; (c) set clear expectations for the quality of the places to be created and how this can be maintained (such as by following Garden City principles); and ensure that appropriate tools such as masterplans and design guides or codes are used to secure a variety of well-designed and beautiful homes to meet the needs of different groups in the community; (d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations) 37 ; and (e) consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size.” The Department for Education has also provided guidance on delivering the education infrastructure needs for garden communities in the document ‘Education Provision in Garden Communities, April 2019’. It has previously been agreed that whilst a garden community in the Cold Meece area is within Stone any new schools required would be part of a 2 tier rather than 3 tier system, including potentially considering an all through school. This level of development**

could only be mitigated by the provision of land and delivery of new 2 tier schools. For up to 6,000 new homes there would be a requirement for the provision of 6FE of both primary and secondary school provision. Land for new schools would need to be provided and included in the masterplan for the development with the developers also required to fund the build costs of the school(s). The number and size of schools would need to be considered further should this option proceed further. The school organisation team will continue to undertake analysis as the detail on potential sites emerges and changes in local demographic information is known. We note that previous discussions have been for up to 12,000 new at Meecebrook Garden Community, and consideration needs to be given to ensuring that new school infrastructure is capable of future expansion should the scale of the project increase in future. For example, this may include allocating open space adjacent to proposed school sites, which would need to be identified as potential change of use for future education provision.

Site Allocation Policies

Q4 - Do you agree with the proposed allocations?

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

Comments: **This site has already been considered due to its inclusion in the current adopted Local Plan. Education mitigation has been identified for the site(s) and this should continue to be secured.**

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

Comments: **This site has already been considered due to its inclusion in the current adopted Local Plan. Education mitigation has been identified for the site(s) and this should continue to be secured.**

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

Comments: **The Station Gateway Project site is split between Stafford Town primary planning area and Stafford West. The Draft Stafford Station Gateway Strategic Regeneration Framework document, June 2022, indicates a total of up to 1,035 dwellings on this site which differs from that indicated in the Preferred Options Consultation document of 'circa 900'. This level of housing (900 dwellings) would be expected to generate 189 primary aged pupils across the 2 primary school place planning areas. Education contributions will need to be secured from this development towards delivery of a new primary school and/or expansions to existing school(s). A new secondary school is proposed to mitigate the impact of housing across Stafford and the surrounding rural area (excluding Meecebrook). The continuing growth across Stafford will be mitigated by delivery of this new secondary school to ensure there are sufficient places across the town. Education contributions will need to be secured from all proposed development in Stafford.**

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

Comments: **Education contributions will need to be secured from these developments towards delivery of additional school places across all phases. We note that 2 sites have been marked with an * in Policy 12, page 54 with the accompanying text: "Two sites in Stafford are marked with an asterisk (*) in the above table. These sites are brownfield sites within the settlement boundary that are allocated for redevelopment for housing but are not counted in the housing trajectory for the plan period. The sites in question are not**

currently achievable and to come forward they will need to demonstrate that they can address education capacity constraints.” The * and paragraph 12.1 can be removed from the local plan document. We note that a small level of housing is proposed on non-strategic sites in rural locations. Due to the rural location of these developments this may require transport to secondary school provision which would have additional implications in terms of transport costs, logistics and highway constraints around school sites. This could involve education contributions being sought towards additional school places, transport costs, highway improvements such as crossing points, and enlargement of the school coach park. We need an indication of the likely trajectory/start date of the smaller non-strategic sites identified in Policy 12, or at least a split between Stafford and Stone to enable us to plan school places, particularly for the larger sites.

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:

These comments should be read in conjunction with our full response which has been sent by email today.

Stafford Borough Council Local Plan 2020-2040

Preferred Options Consultation - December 2022

Introduction

Staffordshire County Council (SCC) has a statutory duty to ensure that there are sufficient school places to meet the needs of the population. The School Organisation Team (SOT) acts on behalf of the Local Authority to carry out this duty and to ensure that resources are used efficiently.

The Borough of Stafford is made up of two areas: 1) Stafford and the surrounding rural area and 2) Stone and the surrounding rural area.

This Preferred Options Consultation identifies or allocates sufficient land for around 12,580 new homes over the plan period 2020-2040, of which 1,120 have already been delivered between 2020-2022. Of the remaining 11,460 new homes identified, 5,925 are on sites that are existing commitments and/or local plan allocations from the current adopted local plan. 3,000 dwellings are proposed within Meecebrook Garden Community, and 2,279 dwellings are proposed on 18 sites identified across the Borough, with the remainder expected through small site windfall.

This consultation response does not assess the impact or requirement for additional school transport, nursery or SEND provision.

The response is based on current demographics and the assumption that not all the housing is delivered at the same time. Given the period that the revision of the Local Plan covers, circumstances may change which could change education infrastructure requirements. We note that the sites identified under Policy 12 have not been given a housing trajectory for each site and instead the trajectory has been totalled across the borough. It would be useful to have an indication of when each site is likely to come forward to enable us to plan school places effectively, or at least split between Stafford and Stone.

Supporting Information

In line with Department for Education (DfE) guidance the School Organisation Team plan school places on a planning area basis; groups of schools based on geographical location, local demographics and other factors such as pupil movement and school phases.

Stafford operates a 2-tier education system with primary phase schools (age 4-11 years) and Secondary phase schools (age 11-16/18 years) and has been split into 6 primary school planning areas and 1 secondary school planning area. Stone operates a 3-tier education system with first schools (age 4-8 years), middle (age 8-13 years) and high schools (age 13-16/18 years) and has been split into 4 first (including 2 rural planning areas with a single school), 1 middle and 1 high school planning area.

School sizes are referred to as Forms of Entry (FE), which are the number of classes of 30 per school year group. For example, a 2FE school would have 2 classes of 30 pupils in every year group (60 pupils per school year group).

Currently within Stafford Borough 35 of the 56 schools physically located in the area are Academies or Free Schools. This number is growing all the time as new schools open, or maintained schools convert to or become sponsored academies. Academies and Free Schools are independent from the local authority and the DfE/Secretary of State would be the decision maker for significant changes to an academy.

A development or a combination of small developments in an area of 750+ dwellings may trigger the need for a new primary school and a development or a combination of small developments of 5000+ dwellings for a new secondary school.

It should be made clear to prospective developers that large residential sites of 750+ dwellings (or combination of sites in an area) would be required to provide land for school site(s) in addition to education contributions to mitigate the development. We would seek assurance from SBC that where a number of proposed developments in one area totalled 750+ dwellings land would be safeguarded for education provision and that the developers contribute proportionally to the cost of buying the land.

Whilst this is not an exhaustive list, where new schools are required the sites would need to be of regular shape, level, flat and without significant topographical features that would be considered incongruent with use as a school, free from contaminants and other adverse ground conditions, and suitable for the phase of education proposed. Other site requirements will also be required such as but not restricted to the provision of utility services onto the site, drainage and vehicular access and will be detailed and discussed when appropriate.

There would need to be a vehicular access route from the adopted highway to the school site at least sufficient and suitable for construction vehicles and vehicles for the delivery of materials for the construction of the school on the school site until the school opens at which point the vehicular access needs to be of an adaptable nature. Other site requirements may be required, and these will be detailed and discussed when appropriate.

Additional land adjacent to any new school may also need to be safeguarded as education land to ensure future growth.

Consideration is required of the implications of proposed housing developments on school transport. Children in villages and settlements without local schools may be entitled to home to school transport where the catchment or nearest school is over two miles walking distance at primary age or three miles at secondary age. There would be additional implications in terms of coach park capacity, transport costs, logistics and highway constraints around school sites in these circumstances. This could involve education contributions being sought towards additional school places, larger coach parks, transport costs and highway improvements such as crossing points.

Any proposed development where the catchment and nearest schools are all over the reasonable walking distance noted above may increase the cost to the public purse for school transport. Consideration must be given to the ongoing costs both to the developer and the public purse of transport costs for pupils living on such developments, and the sustainability and environmental impacts of the site(s). S106 contributions may be required to offset any additional costs related to new development. However, prior consideration needs to be given before to whether growth in such areas is sustainable as ultimately the public purse will pick up the cost of school transport when any developer subsidy ends.

New settlements and urban extensions should be expected to meet the full education requirement either through new schools, expansions or use of existing capacity. Should it not be possible to increase or provide additional capacity to mitigate housing development it may be necessary to transport pupils to areas where there is capacity or the potential for it to be provided. In such circumstances it would be expected that the developer meets these additional transport costs, along with contributions sought towards additional school places, as the need would have arisen as a direct result of their housing development. Provision of additional to school transport in order to provide school places away from the local area impacts on the ability of pupils to use sustainable modes of travel to attend school. This could impact on the local highway infrastructure from the potential increase in vehicles and impacts negatively on proposals to reduce carbon emissions.

Education contributions will be sought towards mitigating the impact of new housing developments.

Delivery of construction projects has become challenging with issues in demand, supply and project risk and opportunity. Commodities prices for copper, steel, and aluminium have all increased. Figures released by the Department for Business, Energy & Industrial Strategy (BEIS) in May 2022 show the Construction Materials Index rising by 3.6% - a 22.9% increase over the last 12 months. With the continued high energy prices, further price increases for heavy side materials should be expected.

There have been major changes in Building Regulations for the first time since 2013 to reflect changes in how buildings are being constructed and the environment, which are expected to further increase the capital cost to deliver construction projects.

There are some school place planning areas where sites for new homes have not been identified/allocated and these areas have therefore not been included in the document.

Stafford and Surrounding Rural Area

Stafford and the surrounding rural area operate a 2-tier school system with primary and secondary schools. For the purposes of planning school places the School Organisation Team has divided Stafford and the surrounding rural area into 6 primary school planning areas, and 1 secondary school planning area.

Stafford Secondary School Place Planning Area

There are currently six secondary schools in this planning area, which will increase to seven with the proposed new secondary school at Stafford North SDL:

Walton High School
Sir Graham Balfour High School
King Edward VI High School - A Language College
The Weston Road Academy
Blessed William Howard Catholic School
Stafford Manor High School

In addition to the existing permissions and adopted local plan site allocations at North of Stafford and West of Stafford, there are a further 1,909 dwellings proposed over the plan period across 11 non-strategic site allocations in Stafford, Gnosall and Woodseaves, and the Stafford Station Gateway Project.

A new secondary school is proposed in this planning area at Stafford North SDL to mitigate the impact of housing across Stafford and the surrounding rural area (excluding Meecebrook). The continuing growth across Stafford will be mitigated by delivery of this new secondary school to ensure there are sufficient places across the town. Education contributions will need to be secured from all proposed development in Stafford.

For information, we note that South Staffordshire District Council have identified a small site for 81 dwellings in the Local Plan Review Regulation 19 Publication Plan Consultation, November 2022. This level of housing would be expected to generate 12 secondary aged pupils and 2 post-16 aged pupils. Education contributions will need to be secured from this development towards additional secondary school places.

We note that a small level of housing is proposed on non-strategic sites in rural locations (234 dwellings in Gnosall and Woodseaves). Due to the rural location of these developments this may require transport to secondary school provision which would have additional implications in terms of transport costs, logistics and highway constraints around school sites. This could involve education contributions being sought towards additional school places, transport costs, highway improvements such as crossing points, and enlargement of the school coach park.

Stafford North Primary School Place Planning Area

There are currently 6 primary schools in this planning area, which will increase to 8 with the 2 new primary schools proposed within the Stafford North SDL.

Veritas Academy
John Wheeldon Primary Academy
Tillington Manor Primary School, Stafford
Parkside Primary School, Stafford
St John's CE (C) Primary School, Stafford
St Patrick's Catholic Primary School

In addition to the existing permissions and adopted local plan site allocations at North of Stafford, there are a further 396 dwellings proposed over the plan period across 1 non-strategic site allocation at MoD Site 4 (HOP08).

We note that this site has been marked with an * in Policy 12, page 54 with the accompanying text:

“Two sites in Stafford are marked with an asterisk (*) in the above table. These sites are brownfield sites within the settlement boundary that are allocated for redevelopment for housing but are not counted in the housing trajectory for the plan period. The sites in question are not currently achievable and to come forward they will need to demonstrate that they can address education capacity constraints.”

This level of housing would be expected to generate 83 primary aged pupils. Education contributions will need to be secured from this development towards delivery of a new primary school.

Therefore the * and paragraph 12.1 can be removed from the local plan document.

Stafford Town Primary School Place Planning Area

There are currently 9 primary schools in this planning area:

Rowley Park Academy
Silkmore Primary Academy
St Leonard's Primary School, Stafford
Burton Manor Primary School
Castlechurch Primary School
Flash Ley Primary School, Stafford
St Paul's CE (VC) Primary School, Stafford
St Austin's Catholic (VA) Primary School
Blessed Mother Teresa of Calcutta Catholic Primary School

The Station Gateway Project site is split between Stafford Town primary planning area and Stafford West. The Draft Stafford Station Gateway Strategic Regeneration Framework document, June 2022, indicates a total of up to 1,035 dwellings on this site which differs from that indicated in the Preferred Options Consultation document of 'circa 900'.

This level of housing (900 dwellings) would be expected to generate 189 primary aged pupils across the 2 school place planning areas. Education contributions will need to be secured from this development towards delivery of a new primary school and/or expansions to existing school(s).

In addition to the existing permissions and the site at Station Gateway, there are a further 379 dwellings proposed over the plan period across 3 non-strategic site allocations at Ashflats (STAFMB03 – 268 dwellings), Former Staffordshire University Campus (HOP03 – 98 dwellings) and Stafford Police Station (STAFMB12 – 13 dwellings).

This level of housing (379 dwellings) would be expected to generate 80 primary aged children. Education contributions will need to be secured from these developments towards additional primary school places.

We note that the Former Staffordshire University Campus (HOP03) site has been marked with an * in Policy 12, page 54 with the accompanying text:

“Two sites in Stafford are marked with an asterisk (*) in the above table. These sites are brownfield sites within the settlement boundary that are allocated for redevelopment for housing but are not counted in the housing trajectory for the plan period. The sites in question are not currently achievable and to come forward they will need to demonstrate that they can address education capacity constraints.”

Therefore the * and paragraph 12.1 can be removed from the local plan document.

Stafford West Primary School Place Planning Area

There are currently 2 primary schools in this planning area, which will increase to 3 with the new primary school proposed within the Stafford West SDL; both schools currently operate a catchment area:

Cooper Perry Primary School
Doxey Primary and Nursery School, Stafford

The Station Gateway Project site is split between Stafford Town primary planning area and Stafford West. The Draft Stafford Station Gateway Strategic Regeneration Framework document, June 2022, indicates a total of up to 1,035 dwellings on this site which differs from that indicated in the Preferred Options Consultation document of ‘circa 900’.

This level of housing (900 dwellings) would be expected to generate 189 primary aged pupils across the 2 school place planning areas. Education contributions will need to be secured from this development towards delivery of a new primary school and/or expansions to existing school(s).

There are no non-strategic sites identified in Policy 12 for this school place planning area.

Stafford South Primary School Place Planning Area

There are currently 6 primary schools in this planning area:

Oakridge Primary School, Stafford
Barnfields Primary School
Berkswich CE (VC) Primary School, Stafford
All Saints CofE Primary School
St Anne's Catholic Primary School, Stafford
Leasowes Primary School, Stafford

There are no non-strategic sites identified in Policy 12 for this school place planning area in Stafford Borough Council Preferred Options Consultation document.

For information, we note that South Staffordshire District Council have identified a small site for 81 dwellings in the Local Plan Review Regulation 19 Publication Plan Consultation, November 2022. This level of housing would be expected to generate 17 primary aged pupils. Education contributions will need to be secured from this development towards additional primary school places.

Stafford Rural 1 Primary School Place Planning Area

This planning area covers the settlement areas of Eccleshall, Woodseaves, Gnosall, Church Eaton and Haughton and there are currently 6 primary schools in the planning area:

Bishop Lonsdale Church of England Primary Academy
Woodseaves CE Primary Academy
Haughton St. Giles CE(C) Primary Academy
All Saints CofE (VC) Primary School, Ranton
Gnosall St. Lawrence CofE Primary Academy
Church Eaton Primary School

The schools in this planning area each serve individual rural settlements/ villages and the impact of residential development needs to be considered on a settlement basis as well as the overall planning area. All schools operate a catchment area.

In addition to the existing permissions there are a further 234 dwellings proposed over the plan period across 7 non-strategic site allocations in Woodseaves and Gnosall villages.

This level of housing would be expected to generate 49 primary aged pupils.

Education contributions will need to be secured from this development towards additional primary school places.

Within the catchment area of Gnosall St Lawrence CE Primary there are two sites totalling 109 dwellings identified in Policy 12 of the Preferred Options Consultation document. This level of development would be expected to generate 23 primary aged pupils.

Within the catchment area of Woodseaves CE Primary Academy there are five potential sites totalling 125 dwellings identified in Policy 12 of the Preferred Options Consultation document. This level of development would be expected to generate 26 primary aged pupils.

Depending on the timing, phasing and dwelling breakdown of the proposed housing developments education contributions may be necessary.

Due to the rural location of this planning area, new development may require transport to secondary school provision which would have additional implications in terms of transport costs, logistics and highway constraints around school sites. This could involve education contributions being sought towards additional school places, transport costs, highway improvements such as crossing points, and enlargement of the school coach park.

Stone and Surrounding Rural Area

Stone and the surrounding rural area operate a 3-tier school system with first, middle and high schools. For the purposes of planning school places, the School Organisation Team has divided Stone and the surrounding rural area into 4 first school planning areas (including 2 planning areas with just 1 school), 1 middle school planning area and 1 high school planning area.

Stone High School Place Planning Area

There is currently 1 high school in this planning area: Alleyne's Academy, Stone. The school operates a catchment area which covers Stone and the surrounding rural area.

There is no catholic high school in the planning area. Blessed William Howard Catholic School, Stafford serves as catholic provision for Stone and the surrounding rural area.

In addition to the existing permissions, there are a further 370 dwellings proposed over the plan period across 6 non-strategic site allocations in Stone. This level of housing would be expected to generate 33 high school aged pupils and 11 post-16 aged pupils.

In the information provided to SBC prior to publication of the preferred options consultation SCC identified this as an area that would be difficult to mitigate housing development at this time due to limitations to expand high school provision in this area.

Due to the ongoing housing development(s) in the area pupil demographics are likely to increase further. The expansion of the high school was required to accommodate existing housing permissions from which pupil numbers are still growing.

We will continue to monitor pupil demographics and local housing to assess how these developments can be mitigated on a site-by-site basis. Depending on the timing, phasing and dwelling breakdown of the proposed housing developments education contributions may be necessary.

Whilst the proposed Meecebrook Garden Community is within Stone, it has previously been agreed that any new schools in this area would be 2-tier rather than 3-tier, so new school requirement would be for primary and secondary school sites (including potentially considering an all through school) rather than first, middle, high school sites. These sites would therefore not form part of the 3-tier system in Stone or the Stone Middle planning area. The comments above do not include mitigation required for the Meecebrook Garden Community.

Stone Middle School Place Planning Area

There are 2 middle schools in this planning area and both schools operate a catchment area:

Walton Priory Middle School
Christ Church Academy

In addition to the existing permissions, there are a further 370 dwellings proposed over the plan period across 6 non-strategic site allocations in Stone. This level of housing would be expected to generate 44 middle school aged pupils.

Due to the ongoing housing development(s) in the area pupil demographics are likely to increase further. The expansion of both middle schools was required to accommodate existing housing permissions from which pupil numbers are still growing.

We will continue to monitor pupil demographics and local housing to assess how these developments can be mitigated on a site-by-site basis. Depending on the timing, phasing and dwelling breakdown of the proposed housing developments education contributions may be necessary.

Whilst the proposed Meecebrook Garden Community is within Stone, it has previously been agreed that any new schools in this area would be 2-tier rather than 3-tier, so new school requirement would be for primary and secondary school sites (including potentially considering an all through school) rather than first, middle, high school sites. These sites would therefore not form part of the 3-tier system in Stone or the Stone Middle planning area. The comments above do not include mitigation required for the Meecebrook Garden Community.

Stone Town School Place Planning Area

This planning area covers the settlements of Stone Town, Oulton and Yarnfield and there are currently 7 first schools in the planning area:

Manor Hill First School, Stone
Springfields First School, Yarnfield
Pirehill First School
St Michael's CE (VC) First School, Stone
Oulton CE (VC) First School
Christ Church CE (VC) First School, Stone
St Dominic's Catholic Primary School, Stone

In addition to the existing permissions, there are a further 370 dwellings proposed over the plan period across 6 non-strategic site allocations in Stone. This level of housing would be expected to generate 56 first school aged pupils.

Due to ongoing housing development(s) in the area pupil demographics are likely to increase further. The expansion of Manor Hill First School was to accommodate existing housing permissions from which pupil numbers continue to grow.

We will continue to monitor pupil demographics and local housing to assess how these developments can be mitigated on a site-by-site basis. Depending on the timing, phasing and dwelling breakdown of the proposed housing developments education contributions may be necessary.

Whilst the proposed Meecebrook Garden Community is within Stone, it has previously been agreed that any new schools in this area would be 2-tier rather than 3-tier, so new school requirement would be for primary and secondary school sites (including potentially considering an all through school) rather than first, middle, high school sites. These sites would therefore not form part of the 3-tier system in Stone or the Stone Middle planning area. The comments above do not include mitigation required for the Meecebrook Garden Community.

Garden Community Site – Meecebrook

Primary and Secondary Provision

The Preferred Options Consultation indicates that a new Garden Community at Meecebrook would deliver 3,000 new homes over the local plan period to 2040, and a further 3,000 new homes beyond the plan period.

This level of housing (3,000 dwellings) would be expected to generate 630 primary school aged pupils, 450 secondary school aged pupils and 90 post-16 aged pupils.

The further 3,000 dwellings (6,000 dwellings total) would in the longer term generate 1,260 primary aged pupils, 900 secondary aged pupils and 180 post-16 aged pupils.

We have previously advised that a minimum of 5,000 new homes would be required to ensure the required new secondary is viable.

We would expect the Local Plan to include reference to a local delivery model that could deal with front-loading and managing the infrastructure transition from early years, through to primary, secondary and post-16 provision. This may include using All Through School models to provide this flexibility and in conjunction with a complementary travel plan that would consider the school transport impacts over the two plan periods associated with the build out rate.

This should be considered in the context of Paragraph 73 of the NPPF (copied below):

“The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant

extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:

(a) consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;

(b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;

(c) set clear expectations for the quality of the places to be created and how this can be maintained (such as by following Garden City principles); and ensure that appropriate tools such as masterplans and design guides or codes are used to secure a variety of well-designed and beautiful homes to meet the needs of different groups in the community;

(d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations) 37 ; and

(e) consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size."

The Department for Education has also provided guidance on delivering the education infrastructure needs for garden communities in the document 'Education Provision in Garden Communities, April 2019'.

It has previously been agreed that whilst a garden community in the Cold Meece area is within Stone any new schools required would be part of a 2 tier rather than 3 tier system, including potentially considering an all through school.

This level of development could only be mitigated by the provision of land and delivery of new 2 tier schools. For up to 6,000 new homes there would be a requirement for the provision of 6FE of both primary and secondary school provision. Land for new schools would need to be provided and included in the masterplan for the development with the developers also required to fund the build costs of the school(s). The number and size of schools would need to be considered further should this option proceed further.

The school organisation team will continue to undertake analysis as the detail on potential sites emerges and changes in local demographic information is known.

We note that previous discussions have been for up to 12,000 new at Meecebrook Garden Community, and consideration needs to be given to ensuring that new school infrastructure is capable of future expansion should the scale of the project increase in future. For example, this may include allocating open space adjacent to proposed school sites, which would need to be identified as potential change of use for future education provision.



Transport comments on Stafford Borough Council's Regulation 18 Preferred Option Consultation, December 2022

General comments

There appears to be very little reference to health throughout the Local Plan document. It is important to recognise the benefits to health through using more sustainable modes of transport, particularly in relation to walking and cycling. These benefits include increased mental health and wellbeing, physical health benefits such as reducing obesity and cardiovascular disease and minimising respiratory issues from air pollution.

Policy 7. Meecebrook Site Allocation

The following paragraphs set out Staffordshire County Council's (SCC) position with regard to Meecebrook. It is important to note that these comments largely relate to a lack of transport evidence to support Meecebrook at this time. Evidence will need to be in place before the Regulation 19 Local Plan is finalised, and SCC will continue to work with and support SBC to bring this evidence forward. Following that there are some specific comments relating to the wording of the Policy itself, as set out in the consultation document.

Meecebrook Garden Community – Transport Issues and Concerns

Stafford Borough Council (SBC) has identified Meecebrook as an opportunity to develop a garden community of approximately 6,000 new homes, 30ha. of new employment land, and associated infrastructure such as retail, schools and health centres. Approximately half of this development would be delivered during the next Local Plan period to 2040, with the remainder in the following plan period.

The concept of Meecebrook Garden Community has been investigated for several years. In 2019 it gained Garden Community status and SBC was awarded government funding, through Homes England, to produce technical evidence to demonstrate its viability and support its inclusion in their emerging Local Plan.

SCC has supported Meecebrook from an economic growth perspective and has been working with SBC throughout the development of this project from all County perspectives (e.g. economy, education and transport). However, the evidence base needs to be robust to deal with all the challenges and to ensure that the right solution is delivered from all County standpoints, including transport.

In transport terms, a new garden community needs to be in a location able to deliver a very sustainable settlement which has walking, cycling and public transport at its heart. These need to be the most attractive modes of transport providing simple and sustainable access to jobs, education, and services.

There are concerns about the site's current accessibility by all modes of transport. From the transport evidence published to date (detailed below), insufficient work has been completed that allows us to understand how this rural location can become a viable sustainable settlement that meets the Government's transport decarbonisation agenda. The site is poorly served by road and public transport and its distance to nearby towns is likely to prohibit substantial numbers of trips by active modes. In addition, there are doubts that 6,000 new homes and 30ha. of new employment can deliver a sustainable settlement, avoiding large amounts of in and out commuting by car.

Meecebrook is located approximately 2 miles north of Eccleshall and 4 miles west of Stone, and has the West Coast Main Line (WCML) running along its western boundary. Access to the M6 can be made via junctions 14 and 15, which are around 6 and 7 miles away respectively. There is limited access to the local A road network, restricted to the A519 for direct access. The A51 and A34 can be reached from the A519, though access to the A34 is likely to be made via less suitable rural roads and lead to junctions on the A34 that are already congested with little land available for improvement. A new rail station is proposed; however, this is on the Crewe line. It is likely that the Birmingham to Liverpool service (via Stafford and Crewe) would be the only service stopping at the proposed station (subject to agreement with Network Rail and the operator(s)). Access to Stone, Stoke-on-Trent and further north would require a change at either Stafford or Crewe.

The National Planning Policy Framework, paragraph 22 states that *"Strategic policies should look ahead over a minimum 15 year period from adoption 15, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger-scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery 16"*

<https://www.gov.uk/guidance/national-planning-policy-framework/3-plan-making#footnote16>

It is difficult to understand how this level of development can afford to provide the necessary infrastructure and in a timely manner without reviewing a Strategic Viability Appraisal and an Infrastructure Delivery

Plan in conjunction with an outline Local Delivery Vehicle model to understand how the enabling infrastructure will be financed and phased. This evidence base needs to be in place to inform the preparation and underpin the publication of the Regulation 19 stage of the Local Plan. Much of this infrastructure will need to be in from the outset to instil travel behaviour (e.g. rail and sustainable modes).

To date, SCC has commented on Meecebrook through Local Plan consultations and provided officer level support through Local Plan workstreams. SBC has appointed Atkins through SCC's framework contract to advise them on several transport issues. SCC's Connectivity Strategy team has supported the borough council by providing advice and feedback on Atkins' work.

SBC has published the 'Meecebrook Garden Community Transport Strategy (2 July 2020)', which was produced by Atkins. This report, and sub-reports, provide a fairly high-level review of future mobility solutions (e.g. mobility hubs and 'last mile solutions'); a Travel Demand Model (i.e. spreadsheet tool to provide a high-level understanding of external trip generation and distribution associated with Meecebrook, and how different approaches to future mobility and sustainable transport could affect this); and a Traffic Modelling Strategy (i.e. a review of the strategic modelling options available to identify the impacts and mitigation requirements of Meecebrook).

Work has also been published to demonstrate the viability of a new railway station. Meecebrook is predicated by the need for a new station, as set out in its Local Plan policy (Policy 7. G.), so this initial feasibility work will need to be advanced to produce a Strategic Outline Business Case which will demonstrate, amongst other things, the viability and deliverability of a new station in this location.

Based on the work undertaken and published so far, there is insufficient transport evidence to justify Meecebrook as a viable and sustainable location at this time.

The 'Meecebrook Garden Community Transport Strategy (2 July 2020)' is very high-level and aspirational and is non-committal in terms of what Meecebrook will deliver on the ground and how this will reduce car trips to provide a settlement that is super sustainable. It is devoid of analyses and needs to be expanded to be more specific and provide analysis demonstrating how the strategy will translate to travel behaviour and a sustainable development. The published Transport Strategy relates to higher levels of development (10,000 new homes) than currently being proposed through the Local Plan.

A key piece of the remaining evidence base will be the production and analysis of a Strategic Traffic Model. Detailed and accurate traffic modelling is required to determine how the site will be accessed from the existing (suitable) road network. In addition, the model will be used to identify the impact of vehicular trips generated by Meecebrook on the local and strategic road networks, determining any necessary highway mitigation (e.g. will trips generated by Meecebrook impact on Stone and Eccleshall to an extent that they require some form of new bypass?).

The model will also be used to test different sustainable travel scenarios, and how these may reduce the number of vehicular trips generated by Meecebrook and potentially lessen the extent of external highway impacts and associated mitigation.

SBC is yet to obtain funding to commission the Strategic Transport Model.

With regard to the Policy, as is in the consultation document, please note the following comments.

C. 15 hectares could generate between 1,125 and 2,000 jobs, depending on land-use (lower end is all B8). Is this enough to support 3,000 houses in a super sustainable new town? There will likely be a high level of out commuting so it is imperative that rail and bus are real alternatives to the car.

G. The policy also needs to make reference to bus provision to key external locations. Cycling and walking links need to be both internal to the site and to other nearby service settlements. The new railway station will need to prioritise access by sustainable modes, keeping car travel to the station to a minimum. Employment and residential developments at Meecebrook should be within a reasonable walking/cycle distance to the station. Potential for a transport hub to be developed at the station to encourage linked sustainable trips. The policy, or at least the supporting text, need to reference mobility / transport hubs (e.g. 20 minute neighbourhoods, last mile trips, freight hubs, etc). It needs to be made very clear this has to be a super sustainable development.

Off-site highway works will inevitably be required, for example, connection to the A road network and potentially improvements to limit the impact of vehicular traffic on Swynnerton, Eccleshall and Stone.

H. Education facilities need to be located in a central locations, ensuring all school trips can be comfortably achieved by non-car modes.

L. The policy should reflect that the sustainable transport structure (i.e. rail, bus, walking/cycling) needs to be in place from the start of the development so that good habits can be instilled from the beginning

taking away reliance on the private car. Improvements to nearby road infrastructure can be based on housing/development number triggers.

M. See comments to L.

It should be noted that these comments are based on the context surrounding the Housing Market Area (HMA) unmet need from the Black Country and Birmingham HMA and also paragraph 73 of the NPPF which states *"The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes)"*.

<https://www.gov.uk/guidance/national-planning-policy-framework/5-delivering-a-sufficient-supply-of-homes>

Policy 8 – Masterplanning and Design at Meecebrook

Appendix 9. Meecebrook Masterplanning. This is not available until Reg 19 consultation, making it very difficult to understand how it is envisaged the development will come forward and will be linked, sustainable and well designed, and also when essential infrastructure may be delivered.

It is noted that the website for Meecebrook contains a Vision Document and Concept Masterplan. However, these documents are also very high-level with regards to transport and more detailed work will be required before Reg 19 to ensure the settlement is deliverable in transport terms.

SCC will continue to work with SBC as work progresses.

Policy 9. North of Stafford

These developments have consent and agreed mitigation requirements. The Policy fails to note some important details such as the link road (A34 to A513) and level of agreed mitigation (See below).

G. No specific mention of (accommodating/funding) the link road through the whole SDL connecting the various land parcels, from A34 (traffic signal at Redhill Business Park) to A513 (near to Sandon Road). Is this inherent in the masterplan or is specific mention required?

J. The agreed mitigation goes a little wider than this, for example, improvements along Sandon Road (south) towards the town. Cycle/walking infrastructure should also be mentioned – internally and connections to existing facilities. Para 9.4 (Bullet 1) also misses some of the agreed wider mitigation.

Policy 10. West of Stafford

The vast majority of this site has consent and agreed mitigation measures, including the new Stafford Western Access Road which is now built and open to traffic.

In terms of the section J (Transport) of Policy 10, it is not clear whether the mention of 'improvements to transport capacity along the A518 Newport Road and its roundabout' is related to construction traffic or development traffic. If the latter, then it is thought that mitigation for the development traffic is all agreed and there is no prospect of revisiting this. If the former, then the word 'improvements' is confusing.

Policy 11. Stafford Station Gateway

The Policy states that the development needs to be delivered in line with the Stafford Station Gateway Strategic Regeneration Framework for the whole site allocation. This sets out in very broad terms what connectivity is required, such as a secondary access to the railway station, pedestrian / cycle links and potential junction access arrangements.

SCC's Connectivity Team is involved with the project group for the Gateway and are included in discussions on issues such as sustainable transport links and facilities, and an additional station access from the west. SCC will continue to be involved to help ensure that suitable improvements are provided that mitigate the transport impacts of this development. However, at this point in time there is not enough evidence to demonstrate whether this development can come forward in transport terms and as such, more detailed transport studies and where relevant, transport assessments, should be developed as proposals are further developed.

The development needs to be designed so that walking, cycling and public transport are the main modes reducing reliance on private vehicles. There will likely be some residual car traffic impacts, and work on the impact of vehicular traffic is still required to ensure that the vehicular trips attracted to the Gateway (and its associated car parks) do not impact on the road network (e.g. Newport Road bridge) or can be mitigated. Consideration should also be given to how parking provision associated with the proposed residential development can be accommodated for the benefit of future residents. The Newport Road bridge is in need of some major maintenance work and Network Rail could potentially reduce the capacity of the bridge in terms of vehicular and non-vehicular traffic. This could impact on the requirements of the Gateway and needs to be considered and investigated when mitigation packages are being developed. SCC will be commissioning Atkins to undertake an Accessibility Study for Stafford railway station Gateway to understand how these issues will be overcome,

providing advice on the most appropriate way for the station to be accessed in the future.

Stafford Western Access Road opened to traffic late in 2021, providing much needed additional road capacity for the town, which should reduce traffic along Station Road, Tenterbanks and Chell Road. It is unlikely that SCC will support new junction accesses to be formed on to the Stafford Western Access Road. However, adding 4th arms to the existing roundabouts on Unicorn Way and Martin Drive may be acceptable.

The Policy (A 2.) mentions 2 toucan crossings on the SWAR – one to the north and one to the south of the Gateway development There are also details about closing Castle Street to through traffic (A 4.) and specific mention of Newport Road cycle routes (A 5.). At this point in time these details have not been finalised and agreed with SCC and there is no certainty they will come to fruition. It appears to be a little too early to be so specific in this Policy and we would expect that further detail will be provided as development proposals become clearer.

Policy 12. Other housing and employment land allocations.

(...and Appendix 2)

Several housing and employment sites are listed in this policy. These are of varying size and some benefit from pre-application discussions on transport and/or have appeared in the previous Local Plan and thus are already deemed acceptable in transport terms. SCC would make the following comments:

Land at Ashflats 268 units (STAFMB03) – this site was in the previous Local Plan and has had previous pre-application discussions with SCC development control staff. SCC can see no insurmountable problems in transport terms, subject to confirmation that the developer is in control of Lawford House as mentioned in Appendix 2.

Former Staffordshire University Campus 98 units (HOP03) – site details in Appendix 2 should also mention the need to provide connections into and possibly contribute towards improvements to the existing pedestrian / cycle network.

MoD Site 4 396 units (HOP08) – There is no mention in the site details in Appendix 2 with regard to capacity assessments along A513 Beaconside and the surrounding area. Beaconside is a congested corridor, and the development will need to provide a suitable transport assessment to demonstrate that it can be accommodated on the road network, or provide mitigation for any traffic impacts it creates. Reference to connections into and potential improvements to the existing pedestrian / cycle network is required. Depending on its timescales relative to the

Maximus site to the north, the MOD site will be expected to seriously consider connectivity through to the Maximus site. This includes pedestrian and cycle permeability, and also the potential to link into the through route being provided by developments to the north. Currently the masterplan for the north includes a link between the A34 (at Redhill Business Park) and the A513 (via Sandon Road). Further investigations of re-routing the connection to the A513 through the MOD site should be investigated and seriously considered. This would provide a more direct link and also avoid the provision of additional major junctions along A513 Beaconside. This would also allow a more comprehensive bus provision for sites in the north. Additionally, SCC's aspiration for this site the re-alignment of Sandon Road through the site. There is an existing dialogue with Homes England and they are aware of the points made above. The site details in Appendix 2 need updating accordingly.

SCC has had previous discussions with Homes England regarding this site. Should the site come forward SCC wish to see it form part of the existing masterplan for the north or provide permeability and have synergies with that site. This is not just from a sustainable transport point of view, these are considered essential but also from the road network. SCC would like to seriously investigate opportunities to rationalise junctions onto the A513 Beaconside and provide a realignment of Sandon Road through the site. In addition, the current masterplan for the north contains a link road between the A34 (at Redhill Business Park) and the A513 (via Sandon Road). Possibilities to re-route this link road through the MoD site and to their proposed access onto A513 Beaconside need to be explored. This would provide a more direct link and also avoid the provision of additional major junctions along A513 Beaconside. This would also allow a more comprehensive bus provision for sites in the north. There is an existing dialogue with Homes England and they are aware of the points made above. The site details in Appendix 2 need updating accordingly.

Land at Marborough Road, Stone 101 units (STO07) – The developer will need to produce a transport assessment and demonstrate that their trips can be accommodated on the network or that their impact can be mitigated. However, Walton roundabout is congested with very little land available to provide an effective increase in capacity, which could be a barrier to development. Links and improvements to sustainable transport will be imperative at this site to reduce residual traffic impact.

Land to the north of Redhill 31.15 ha. employment (CRE03) - Redhill employment (31ha) – Appendix 2 picks up the need for transport assessments along A34. Of main concern is Redhill roundabout and the traffic signals with Redhill Business Park. The former could be a barrier to development and the developer (who it is understood is currently

preparing a rep) will need to demonstrate that the junction can accommodate traffic from this development, or that there is a solution which can be provided. The site should also look to provide bus services and connect into the existing cycle network. Two points of access will also be required to the site extension, as it is above 8ha.

Para 12.1 refers to potential MOD and University sites. It says these sites will have to demonstrate they can address any education capacity issues. Reference should also be made to them addressing transport capacity issues, given their location on or near to Beaconside.

It may be worthwhile including a general paragraph about all developments needing to reduce the need to travel by car and prioritising sustainable transport, in line with Policy 52.

Policy 19. Town Centres.

SCC usually expects development to be located within 350m of a bus stop, not 400m. This will be reviewed in our next Local Transport Plan, which will be adopted after the Local Plan.

Policy 21 – Tourism Development (B)

It is suggested that there is some additional wording within this policy regarding sustainable transport. It is important that tourist attractions/accommodation of this type can be accessed by all modes of transport to avoid them being primarily car dependent.

Policy 22 - Canals

This policy needs to reference canals as a transport option. The wording should also refer to canal towpaths being important for sustainable travel connections such as walking and cycling to and from new developments. This could be incorporated into the wording regarding sentence 4 and the desire to make public access easier. This would help to improve connectivity between existing settlements and proposed new settlements as well as contributing to positive impacts on the mental health and wellbeing of communities.

Housing Policies 23-33

These policies should make reference to EV charging, parking standards, cycle storage and reliable full fibre broadband.

It is acknowledged that EV charging is covered in Policy 51: Air Quality, paragraph 53.3 and Appendix 4, Parking standards in Policy 53 and Appendix 4, Cycle storage in Appendix 4: Parking Standards and broadband in Policy 38. However, it is still felt that the Housing Policies should make reference to these points.

Policy 34 Urban design general principles

This policy covers walking and cycling in accordance with Manual for Streets (MfS). This should be clear that facilities need to be provided within the sites but also that they should connect into existing cycling and walking infrastructure where appropriate.

Policy 37 - Infrastructure to support new development

It is suggested that the wording in this policy needs to be stronger with regard to developers providing mitigation 'where applicable'. Paragraphs 37.2 and 37.3 also relate to this. The term 'Infrastructure' does not make it clear that mitigation should also include things such as enhanced bus services or travel plans.

Policy 38 – Electronic Communications

This policy covers full fibre broadband but it refers to major developments. It would be helpful if the threshold as to what constitutes major development is set out within the policy. Paragraph 38.2 appears to contradict this and refers to all development.

Policy 51 – Air quality

There should be specific reference in this section to ensuring that new development does not cause unacceptable impacts on air pollution from cars, given this is one of the major causes of air pollution.

In paragraph C, it is suggested that the policy wording is stronger. Development should not cause unacceptable levels of air pollution. If this wording remains, it is suggested that the following change is considered, "the following measures ~~may~~ **will** be sought". This does not then leave any possibility of development coming forward without adequate mitigation measures in place.

Policy 52 - Transport

We are supportive of this policy being included within the Local Plan. However, there are a number of areas within the explanatory text that could be expanded and would help to strengthen this policy further.

In number 3, it is suggested adding the word 'cumulative' before 'impact'.

It is suggested that in number 7, the word 'unacceptable' is removed as it is not clear as to how this is defined.

In number 8, it is suggested that the word 'severe' is deleted. Again, it is not clear as to what defines 'severe'.

Explanatory text

Para 52.1 – the wording within this explanatory text as it currently stands does not provide enough detail in terms of which types of development the policy does/does not apply to, for example, is it intended to be applied to major development only. It is noted that there is a specific reference within the explanatory text which states that not all the paragraphs will be applicable for every type of development and the example given is householder developments. However, it could be argued that all parts of the policy in some form are relevant to householder developments and if this is not the case, an explanation in the supporting text should be provided to make it clear as to which sections are not relevant and why. If this is missing, there is the potential for developers to find flexibility in not having to provide certain measures due to ambiguity within the policy and the supporting text.

Para 52.2 should also discuss public transport improvements, making reference to contributing to the implementation of Staffordshire's Bus Service Improvement Plan (BSIP).

Para 52.3. It is noted that there is reference to the Local Transport and the Integrated Transport Strategies. A review of the Local Transport Plan will be undertaken in early 2023 together with Stafford's respective Transport Strategy. You may wish to refer to this in para 52.3.

Para 52.4. There are also local design guides available which are useful documents and therefore reference to these should be made in this section.

Para 52.6 – this appears to be in the wrong section.

Electric Vehicle Charging – general comment/reflection

It is noted that electric vehicle charging is referenced within the Local Plan and that current legislation (Building Regulations) requires the installation of EV charging points in new residential and non-residential buildings. However, moving forward there may also be a demand/need for areas to be used as charging hubs. Consideration of where the potential locations/areas of land for these are allocated should be taken into account as part of the Local Plan.

Freight/Lorry parking – general comments

In the Issues and Options consultation, a number of comments were made in relation to freight, the freight strategy and HGV parking. There is still an omission of text or a policy in relation to this issue. Therefore, comments made previously in relation to this will remain valid for this consultation. Please see below for a copy of the previous comments:-

Issues and Options consultation – comments regarding freight/lorry parking

With reference to lorry parking Staffordshire County Council's Freight Strategy includes a specific section on this issue and should form part of the evidence base.

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 SWAR 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 – this 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

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.

From: David Price [REDACTED]
Sent: 11 December 2022 21:30
To: Strategic Planning
Cc: [REDACTED]
Subject: Stafford Borough Local Plan 2020-2040 Preferred Options Consultation -
Response by Seighford Parish Council
Attachments: Stafford Borough Council Local Plan 2020 Preferred Options Consultation Process
(3).docx

Dear Sirs

Attached is Seighford Parish Council's response to the Stafford Borough Local Plan 2020-2040 Preferred Options document.

Will you please acknowledge receipt.

Regards

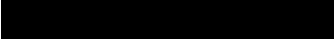
David Price
Chairman of Seighford Parish Council
Tel: [REDACTED]

Sent from [Mail](#) for Windows



Seighford Parish Council



Email: 

Stafford Borough Council Local Plan 2020 - 2040 Preferred Options Consultation

Response by Seighford Parish Council

Introduction

The Civil Parish of Seighford lies immediately on the west side of the town of Stafford. The M6 Motorway forms part of the boundary on the east side. The Parish is mainly rural in character and includes the Villages of Derrington, Great Bridgeford and Seighford and the Ladfordfields Industrial Estate.

Response to the Preferred Options Consultation Document

Seighford Parish Council has carefully considered the Stafford Borough Council Local Plan 2020-2040 Preferred Options and makes the following representations:-

Meecebrook Garden Community

1. The Council strongly objects to this proposal because it would embrace the loss of upwards of 1,000 acres of good agricultural land shown as grades 2 and 3 on the Agricultural Land Classification Plan for West Midlands published by Natural England. The whole proposal is considered to be misconceived because it was understood that the original concept of the Meecebrook Garden Community was that it was to be sited on brownfield land being part of the Swynnerton Training Area but, for unexplained reasons, a decision was made to move the proposal site southwards taking up a large area of some of the best agricultural land in the County. The proposal is also in contravention of the National Planning Policy Framework which requires that local government seeks to protect and preserve the best and most versatile agricultural land. Furthermore, the proposal is directly in contravention of the Consultation Document's Policy 3 Development in the Countryside – general principles where it is stated that “this policy is to protect the countryside from unnecessary and incongruous development” and Policy 20 Agricultural and Forestry Development which states that “The Borough Council wishes to encourage local food growing and land based rural business”.
2. The Council also strongly objects to this proposal because of the considerable impact it will have on the Parish of Seighford particularly Great Bridgeford through which the A5013 road runs currently carrying upwards of 1200 vehicles per hour. With the anticipated increase in vehicular traffic generated by the Garden Community development, it is estimated that the number of vehicles travelling through Great Bridgeford on the A5013 could double. This would not be sustainable bearing in mind the narrowness of the

existing carriageway and the considerable problems at peak times of the build up of traffic from the M6 Junction 14 island northwards. Very substantial improvements, including widening and dualling of the road, would be needed to upgrade this section of the A5013 road to deal with the increased traffic volumes. Furthermore, the impact of the increased traffic and the upgrading of the highway infrastructure would lead to widespread blighting of residential properties in Great Bridgeford.

Employment Land at Ladfordfields Industrial Estate

The proposed provision of additional employment land is considered to be acceptable by the Council as a natural extension to the Ladfordfields Industrial Estate to reflect the increased demands for employment opportunities which will follow from the increased number of houses proposed to be built.

The Villages of Derrington, Great Bridgeford and Seighford

These villages are classed as Tier 5 settlements. It is noted that the settlement boundaries are drawn tightly and follow the residential development boundaries shown in the Stafford Borough Local Plan 2001 thus providing few opportunities for new allocations of housing land in these villages for the duration of the Plan. This policy is considered by the Council to be unacceptable as it precludes future generations of local families from building homes. However, this restriction is mitigated to a certain extent by the affordable housing provisions in the Plan viz Policy 25 – “Rural exception sites” that provides that on sites outside of but directly adjoining the settlement boundaries of tier 4 and tier 5 settlements, the following categories of development will be supported in principle:-

1. Proposals for entry level exception sites and
2. Proposals for affordable housing exception sites which are in accordance with paragraph B of the policy.

10th December 2022

09 December 2022

Our ref: Stafford BC 7

Dear Sir/Madam,

Stafford Borough Local Plan 2020-2040: Preferred Options

Thank you for the opportunity to comment on your consultation, we have summarised our response into this document. Please keep us informed when your plans are further developed when we will be able to offer more detailed comments and advice.

Position Statement

As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments on the impacts of future developments and to provide advice regarding policy wording on other relevant areas such as water efficiency, Sustainable Drainage Systems (SuDS), biodiversity, and blue green infrastructure. Where more detail is provided on site allocations, we will provide specific comments on the suitability of the site with respect to the water and sewerage network. In the instances where there may be a concern over the capacity of the network, we may look to undertake modelling to better understand the potential risk. For most developments there is unlikely to be an issue connecting. However, where an issue is identified, we will look to discuss in further detail with the Local Planning Authority. Where there is sufficient confidence that a development will go ahead, we will look to complete any necessary improvements to provide additional capacity.

POLICY 4. Climate change development requirements

We are supportive of the policies efforts to incorporate both water efficiency and Sustainable Drainage Systems (SuDS). The impacts of climate change are expected to have two key impacts to the general water cycle:

- An increased risk of drought putting pressure on water resource, and during hot weather (with more people using hosepipes and paddling pools) increasing the risk of distribution issues. The policies expectation for new development to design to a maximum water usage of 110 litres per person per day is a positive contribution towards mitigating this risk.
- More intense rainfall events may lead to an increased risk of flooding. Managing surface water sustainably is key to facing into this problem. The plans proposed policies push for more Sustainable Drainage Systems (SuDS) is a positive contribution towards mitigating this risk, particularly Policy 43 – Sustainable Drainage. We would highlight that whilst doing the right thing moving forward via planned development is vital, climate change efforts can also be made via public realm, green infrastructure, and urban retrofitting. We would welcome

any conversations around retrofitting green infrastructure within the Borough. We also have ambitions to manage surface water more sustainably and believe through working in partnership with the Borough Council and other Risk management Authorities (RMAs) we can maximise the value, benefits, and efficiency of public realm improvements.

POLICY 7. Meecebrook site allocation

The Meecebrook proposal provides a unique opportunity to design and showcase leading sustainability practices. Delivery and phasing of a development of this scale will require careful master planning and we're pleased to see this covered via the Meecebrook Framework Masterplan Supplementary Planning Document and Policy 8 Masterplanning and design at Meecebrook.

Being a new settlement there is currently very little existing infrastructure provisions serving the site, and any which do exist certainly were not designed for a development of the scale proposed. We welcome continued discussion around phasing, timelines and wider holistic planning as we (alongside other Risk Management Authorities and utility providers) may need to shape investment programs to facilitate the site progressing sustainably.

From a water cycle perspective, the location of the development has some unique constraints which are important to note in the context of wider design and planning considerations;

- The North Staffordshire Water Resource Zone is an area which has long term pressures to the "supply/demand" balance which may require future investment. More information around Water Resources can be found in our draft Water Resource Management Plan (dWRMP) viewable on our website (<https://www.severntrent.com/about-us/our-plans/>).
- Local environmental capacity to receive treated final effluent. The local watercourses in proximity to the development are small in scale, with relatively low baseline flows in proportion to the volume of treated final effluent which will be produced and returned the environment from the new settlement. Whilst we would prefer localised/on-site wastewater treatment, discharging the treated final effluent locally may be technically unachievable based on the current and best available technologies and permitting requirements.

Whilst the above two points provide some context around constraints, they are not showstoppers and could be overcome with the appropriate planning and investment. We are already in conversations with the Borough Council, Environment Agency and other key stakeholders over a holistic water cycle approach for the Meecebrook proposals and we expect this to continue as proposals take shape.

Strategic Allocations in Stafford

Stafford town has been an area of significant investment for us in recent years as we've prepared for the long-standing proposals around North of Stafford (POLICY 9.) and. West of Stafford (POLICY 10). We delivered infrastructure improvement works in the region of £800k back in 2016 and are actively reviewing our position for further improvement works to ensure that development needs within the town can be accommodated sustainably. We anticipate some additional investment may be required in relation to the proposals in the West of Stafford and around Stafford Station Gateway (POLICY 11.) and we are already well underway with investigations and the shaping of this capital work.

POLICY 12. Other housing and employment land allocations

The following table summarises our assessment of potential sewerage and drainage (surface water) constraints for the proposed allocations.

Type	Settlement	Site Name	Yield	Comment	Risk
Housing	Stafford	Land at Ashflats (STAFMB03)	268	No issues expected so long as surface water is managed sustainably and not discharged to the public combined sewerage system. SuDS should be implemented in a "management train" and not just as a single end of pipe storage basin. We recommend that all surface water discharge rates are either equal or lower than the sites natural greenfield run-off rate, this also applies to re-development of brownfield site.	Low
		Stafford Police Station (STAFMB12)	13		
		Former Staffordshire University Campus (HOP03)	98		
		MoD Site 4 (HOP08)	396		
	Stone	SCC Depot, Newcastle Road (STO05)	18		
		Land at Marlborough Road (STO07)	101		
		Land at Trent Road (STO08 and STO10)	20		
		Land adjacent to Stone Police Station (STO09)	3		
		Land East of Oakleigh Court (STO13)	131		
		Land at Uttoxeter Road (STO16)	97		
	Gnosall	Bank Top Garage, Stafford Road (GNO02)	9		
		Land east of Stafford Road (GNO04 (west))	100		
	Woodseaves	Garage off A519 (HIG07)	2		
		Land adjacent to The Croft (HIG10)	25		
		Land off A519 opposite B5405 (HIG11)	5		
Land to rear of Woodseaves School (HIG13)		88			
Land off Moscow Lane (Site 07)		5			
Employment	Seighford	Land to the east of Ladfordfields (SEI01)	5.6 Ha	The developer may require a sewer requisition (Water Industry Act Section 98) to enable a connection to the public sewerage system. We would encourage the developer to make contact with us as early as practically	Medium
	Stafford	Land to the north of Redhill (CRE02)	31.15 Ha		

				possible to discuss their drainage strategy.	
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POLICY 43. Sustainable drainage

We are supportive of the strong stance around Sustainable Drainage, it's not often we see bespoke planning policy dedicated to this topic. The policy provides a clear stance and approach to minimising flood risk and the impact that new development has on existing communities. We would however recommend a slight build to the policy by specifically referencing the drainage hierarchy, please see the below section within this document on Surface Water and the Drainage Hierarchy.

Whilst the effective use of Sustainable Urban Drainage (SuDS) goes along way to managing surface water it does not negate the need to align to the drainage hierarchy and avoid/reduce the amount that ends up discharging to the public combined sewerage system. Surface water discharge from new development can often be 10 to 15 times larger than the sites foul flow. New or increased connections of surface water into the combined sewerage system should be avoided. Where it cannot be avoided, it should be offset via public realm improvements of which we would welcome engagement and discussion on. Failing to avoid or offset surface water discharge to the combined sewerage system could cause or exacerbate flood risk.

POLICY 46. Green and blue infrastructure network

We welcome any conversations with the Borough Council, other Risk Management Authorities, or partners on programmes of work around regeneration and public realm improvements. We believe this type of work deliver a wide range of benefits including placemaking, biodiversity, amenity, water quality, flood risk and climate change resilience. We would like to raise awareness of our work in [Mansfield](#), whilst the scale of this project is larger than normal, we believe the type of work involved can be delivered in many urban areas.

For your information we have set out some general guidelines and relevant policy wording that may be useful to you.

Wastewater Strategy

We have a duty to provide capacity for new development in the sewerage network and at our Wastewater Treatment Works (WwTW) and to ensure that we protect the environment. On a company level we are producing a Drainage and Wastewater Management Plan covering the next 25 years, which assesses the future pressures on our catchments including the impacts of climate change, new development growth and impermeable area creep. This plan will support future investment in our wastewater infrastructure and encourages collaborative working with other Risk Management Authorities to best manage current and future risks.

Where site allocations are available, we can provide a high-level assessment of the impact on the existing network. Where issues are identified, we will look to undertake hydraulic sewer modelling to better understand the risk and where there is sufficient confidence that a development will be built, we will look to undertake an improvement scheme to provide capacity.

Surface Water

Management of surface water is an important feature of new development as the increased coverage of impermeable area on a site can increase the rainwater flowing off the site. The introduction of these flows to the public sewerage system can increase the risk of flooding for existing residents. It is therefore vital that surface water flows are managed sustainably, avoiding connections into the foul or combined sewerage system and where possible directed back into the natural water systems. We recommend that the following policy wording is included in your plan to ensure that surface water discharges are connected in accordance with the drainage hierarchy:

Drainage Hierarchy Policy

New developments shall demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, whereby a discharge to the public sewerage system is avoided where possible.

Supporting Text:

Planning Practice Guidance Paragraph 80 (Reference ID: 7-080-20150323) states:

“Generally the aim should be to discharge surface water run off as high up the following hierarchy of drainage options as reasonably practicable:

1. into the ground (infiltration);
2. to a surface water body;
3. to a surface water sewer, highway drain, or another drainage system;
4. to a combined sewer.”

Sustainable Drainage Systems (SuDS)

Sustainable Drainage Systems (SuDS) represent the most effective way of managing surface water flows whilst being adaptable to the impact of climate change and providing wider benefits around water quality, biodiversity, and amenity. We therefore recommend that the following policy wording is included within your plan regarding SuDS:

Sustainable Drainage Systems (SuDS) Policy

All major developments shall ensure that Sustainable Drainage Systems (SuDS) for the management of surface water run-off are included, unless proved to be inappropriate.

All schemes with the inclusion of SuDS should demonstrate they have considered all four areas of good SuDS design: quantity, quality, amenity and biodiversity.

Completed SuDS schemes should be accompanied by a maintenance schedule detailing maintenance boundaries, responsible parties and arrangements to ensure the SuDS are managed in perpetuity.

Supporting Text:

Sustainable Drainage Systems (SuDS) should be designed in accordance with current industry best practice, The SuDS Manual, CIRIA (C753), to ensure that the systems deliver both the surface water

quantity and the wider benefits, without significantly increasing costs. Good SuDS design can be key for creating a strong sense of place and pride in the community for where they live, work and visit, making the surface water management features as much a part of the development as the buildings and roads.

Blue Green Infrastructure

We are supportive of the principles of blue green infrastructure and plans that aim to improve biodiversity across our area. Looking after water means looking after nature and the environment too. As a water company we have launched a Great Big Nature Boost Campaign which aims to revive 12,000 acres of land, plant 1.3 million trees and restore 2,000km of rivers across our region by 2027. We also have ambitious plans to revive peat bogs and moorland, to plant wildflower meadows working with the RSPB, National Trust, Moors for the Future Partnership, the Rivers Trust, National Forest and regional Wildlife Trusts and conservation groups.

We want to encourage new development to continue this theme, enhancing biodiversity and ecology links through new development so there is appropriate space for water. To enable planning policy to support the principles of blue green Infrastructure, biodiversity and protecting local green open spaces we recommend the inclusion of the following policies:

Blue and Green Infrastructure Policy

Development should where possible create and enhance blue green corridors to protect watercourses and their associated habitats from harm.

Supporting Text:

The incorporation of Sustainable Drainage Systems (SuDS) into blue green corridors can help to improve biodiversity, assisting with the wider benefits of utilising SuDS. National Planning Policy Framework (2018) paragraph 170 States:

“Planning policies and Decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their Statutory Status or identified quality in the development plan);
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;”

Green Open Spaces Policy

Development of flood resilience schemes within local green spaces will be supported provided the schemes do not adversely impact the primary function of the green space.

Supporting Text:

We understand the need for protecting Green Spaces, however open spaces can provide suitable locations for schemes such as flood alleviation schemes to be delivered without adversely impacting on the primary function of the open space. If the correct scheme is chosen, the flood alleviation schemes can result in additional benefits to the local green space through biodiversity and amenity benefits.

Water Quality and Resources

Good quality watercourses and groundwater is vital for the provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that the water quality of our supplies are not impacted by our operations or those of others. Any new developments need to ensure that the Environment Agency's Source Protection Zones (SPZ) and Safeguarding Zone policies which have been adopted by Natural Resources Wales are adhered to. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan as prepared by the Environment Agency.

Every five years we produce a Water Resources Management Plan (WRMP) which focuses on how we plan to ensure there is sufficient supply of water to meet the needs of our customers whilst protecting our environment over the next 25 years. We use housing target data from Local Planning Authorities to plan according to the projected growth rates. New development results in the need for an increase in the amount of water that needs to be supplied across our region. We are committed to doing the right thing and finding new sustainable sources of water, along with removing unsustainable abstractions, reducing leakage from the network and encouraging the uptake of water meters to promote a change in water usage to reduce demand.

New developments have a role to play in protecting water resources, we encourage you to include the following policies:

Protection of Water Resources Policy

New developments must demonstrate that they will not result in adverse impacts on the quality of waterbodies, groundwater and surface water, will not prevent waterbodies and groundwater from achieving a good status in the future and contribute positively to the environment and ecology.

Where development has the potential to directly or indirectly pollute groundwater, a groundwater risk assessment will be needed to support a planning application.

Supporting Text:

National Planning Policy Framework (July 2018) Paragraph 163 states:

“Planning policies and decisions should contribute to and enhance the natural and local environment... e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should wherever possible, help to improve local environmental conditions such as river basin management plans;”

Water Efficiency Policy

We are supportive of the use of water efficient design of new developments fittings and appliances and encourage the optional higher water efficiency target of 110 litres per person per day within part G of building regulations. Delivering against the optional higher target or better provides wider benefits to the water cycle and environment as a whole. This approach is not only the most sustainable but the most appropriate direction to deliver water efficiency. We would therefore recommend that the following wording is included for the optional higher water efficiency standard:

New developments should demonstrate that they are water efficient, incorporating water efficiency and re-use measures and that the estimated consumption of wholesome water per dwelling is calculated in accordance with the methodology in the water efficiency calculator, not exceeding 110 litres/person/day.

Supporting Text:

National Planning Policy Framework (July 2018) Paragraph 149 states:

“Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.”

This need for lower water consumption standards for new developments is supported by Government. In December 2018, the Government stated the need to a reduction in Per Capita Consumption (PCC) and issued a call for evidence on future PCC targets in January 2019, with an intention of setting a long term national target. The National Infrastructure Commission (NIC) has already presented a report including recommendations for an average PCC of 118 l/p/d. In Wales, the 110 l/p/d design standard was made mandatory in November 2018. In 2021 the Environment Agency classed the Severn Trent region as Seriously Water Stressed – [link](#).

We recommend that all new developments consider:

- Single flush siphon toilet cistern and those with a flush volume of 4 litres.
- Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.
- Hand wash basin taps with low flow rates of 4 litres per minute or less.
- Water butts for external use in properties with gardens.

Water Supply

For the majority of new developments, we do not anticipate issues connecting new development, particularly within urban areas of our water supply network. When specific detail of planned development location and sizes are available a site-specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise

to investigate any potential impacts. If significant development in rural areas is planned, this is more likely to have an impact and require network reinforcements to accommodate greater demands.

Developer Enquiries

When there is more detail available on site-specific developments, we encourage developers to get in contact with Severn Trent at an early stage in planning to ensure that there is sufficient time for a development site to be assessed and if network reinforcements are required that there is time to develop an appropriate scheme to address the issues. We therefore encourage developers to contact us, details of how to submit a Developer Enquiry can be found here -

<https://www.stwater.co.uk/building-and-developing/new-site-developments/developer-enquiries/>

We hope that this information has been useful to you and we look forward to hearing from you in the near future.

Yours Sincerely,

Jack Robinson

Strategic Catchment Planner



From: Edward Fox [REDACTED]
Sent: 08 December 2022 11:58
To: Strategic Planning
Cc: [REDACTED]
Subject: SSDC response to SBC Preferred Options consultation.
Attachments: Interim response to SBC Local Plan 2020-2040 PO Consultation.pdf

Dear Sir/Madam,

Please find attached South Staffordshire Council's interim response to Stafford BC's Local Plan Preferred Options consultation.

Please note that this response is still to be considered through our constitutional Member agreement process, however I will write to you again once this has concluded to confirm the Council's formal response.

Kind regards

Ed

Edward Fox

Strategic Planning Team Manager
Strategic Planning
South Staffordshire Council

Tel: [REDACTED]
www.sstaffs.gov.uk



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Sent via email to:

strategicplanning@staffordbc.gov.uk

Please ask for: Ed Fox

Direct Dial: [REDACTED]

Email: [REDACTED]

08 December 2022

NOTE: As this response relates to a Duty to Cooperate matter, our response will need to be an individual Decision of our Cabinet Member for Planning and Business Enterprise, Councillor Terry Mason and therefore please accept this response as the Council's interim response pending completion of the Council's constitutional process to agree the comments. Once the response has been agreed with Members, we will write to you again to confirm the Council's formal response.

South Staffordshire Council response to the Stafford Borough Council Local Plan 2020-2040 Preferred Options Consultation

Thank you for consulting South Staffordshire District Council (SSDC) on the Stafford Borough Council (SBC) Local Plan 2020-2040 Preferred Options.

SSDC previously responded to SBC's Issues and Options Consultation with an interim response on the 23rd March 2020 which was later confirmed on the 29th April 2020.

SSDC and SBC are neighbouring authorities and therefore have a 'duty to cooperate' with each other under section 33A of the Planning and Compulsory Purchase Act 2004.

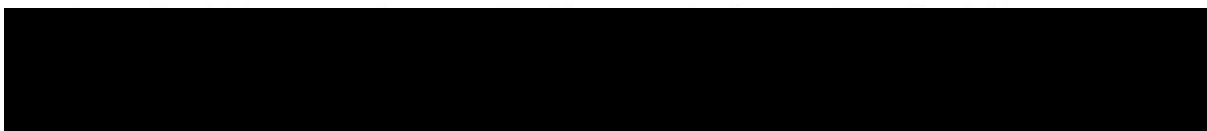
South Staffordshire Local Plan Update

South Staffordshire are currently consulting on their Publication Local Plan (Regulation 19) between Friday 11th November and Friday 23rd December 2022.

Comments

Housing

SSDC and SBC are in separate housing market areas. SSDC acknowledge that the Stafford Borough Local Plan 2020-2040 Preferred Options is currently proposing to meet their own housing needs in full and are not seeking contributions from any other neighbouring authorities. As stated in SSDC's response to the SBC's Issues and Options Consultation, any oversupply in housing presents an opportunity for SBC to make a direct contribution towards meeting the shortfall of housing need identified within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). Such an approach would be consistent with national policy as identified within the National Planning Policy Framework paragraph 137 which promotes a sequential approach to exploring potential development opportunities prior to the release of Green Belt sites. This approach includes 'discussions with neighbouring authorities about whether they could accommodate some of the identified need for development'. SSDC would therefore encourage SBC to engage in dialogue with those authorities



generating unmet needs within the GBBCHMA to consider whether there is justification for any surplus housing supply in Stafford Borough being attributed to those authorities. South Staffordshire are also planning on meeting their full housing requirements as part of its emerging Local Plan 2018-2039, whilst making an appropriate contribution to the unmet needs of the GBBCHMA.

Employment

SSDC's 2022 Economic Development Needs Assessment (EDNA) identified SSDC and SBC both within the South Staffordshire functional economic market area (FEMA), alongside Cannock, Dudley, Walsall and Wolverhampton. SSDC acknowledge that the Stafford Borough Local Plan 2020-2040 Preferred Options is currently proposing to meet their employment land needs in full and are not seeking contributions from any other neighbouring authorities. However, as with the issue of housing, SSDC would encourage dialogue with neighbouring authorities specifically the four Black Country authorities (whose published evidence indicates a substantial circa 210ha shortfall in employment land) to explore if there is justification for any surplus employment supply in Stafford Borough being attributed to those authorities. South Staffordshire are also planning on meeting their full employment land needs as part its emerging Plan 2018-2039 whilst making an appropriate contribution to the unmet needs of the Black Country.

Gypsy and Traveller Accommodation

Policy 30 - Gypsy and traveller accommodation seeks to allocate a site for at least 15 pitches near to Hopton and a site for at least 10 pitches near to Weston. This is to meet a need for 22 Planning Policy for Traveller Site (PPTS) Pitches. The supporting text to the policy describes how there is a need for 26 non-PPTS need which are expected to come forward through the development management process.

SSDC has identified a 121 pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 72 pitches within the first 5 year period¹. SSDC has allocated all suitable sites as identified through our 2021 Pitch Deliverability Study through our Regulation 19 Publication Plan, including sites in the Green Belt. Furthermore, all publicly owned land options in the District (including Green Belt options) have been explored for their potential to provide new public site options which could address specific families' needs and thereby reduce the shortfall. These assessments are set out on the Council's evidence base page under the Gypsy and Travellers sub-heading: [Local Plan Review Evidence Base South Staffordshire Council \(sstaffs.gov.uk\)](https://www.sstaffs.gov.uk/local-plan-review-evidence-base-south-staffordshire-council). In addition, engagement has taken place with site promoters of our proposed housing allocations to explore if they are able to provide a part of their site for a public traveller site. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on site. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.

SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment in 2021, SSDC wrote to all HMA and neighbouring authorities in January 2022 setting out the extent of

¹ South Staffordshire Council Gypsy and Traveller Accommodation Assessment – Final Report August 2021

the pitch shortfall, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which would address the unmet need. This letter then requested authorities examine their ability to contribute to its unmet pitch needs, specifically in the form of extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC. It then wrote again to these same authorities in August 2022, providing an update on extra efforts that SSDC had made to identify new public sites within the District upon Staffordshire County Council land. Despite these efforts, the letter communicated that a significant shortfall still remained and that SSDC required assistance in addressing its unmet pitch needs through new or expanded publicly run sites.

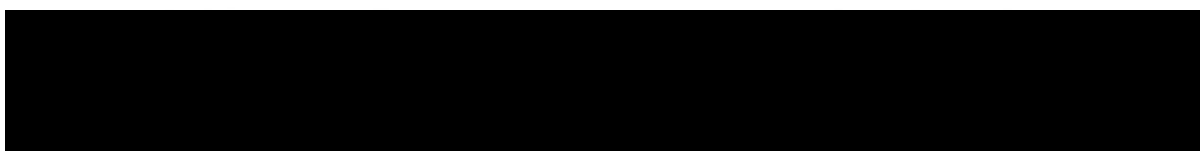
SBC's most recent response to the August 2022 correspondence provided additional clarification in order to confirm their previous position in January 2022 that Stafford Borough would not be able to accommodate any identified unmet Gypsy and Traveller accommodation needs from South Staffordshire. SBC is currently seeking to provide sufficient sites to meet its own Gypsy and Traveller accommodation needs and is progressing with the Local Plan 2020-2040. The call for sites process remains open, and relevant policy context is available through the Preferred Options consultation currently taking place during October to December 2022. In SSDC's view it is therefore currently unclear as to what extent SBC may or may not be able to assist in meeting unmet pitch need arising from SSDC, as the call for sites identification process is still on-going, including covering the Green Belt areas. In addition, SSDC have not received confirmation from SBC that publicly owned land, or land as part of housing allocations have been considered when exploring new public pitch options. SSDC are seeking to ensure that neighbouring and GBBCHMA authorities undertake the same steps that SSDC have taken in exploring pitch options so we can have confidence that our Duty to Cooperate partners have taken a consistent approach. We therefore request that through you plan preparation you explore the following options:

- Consider capacity to intensify/expand existing public sites
- Consider options for new public sites on publicly owned land within the Borough
- Explore if site promoters of your preferred housing allocation are willing to gift a proportion of their site to be run as a public traveller site.

Cannock Chase Special Area of Conservation (SAC) / air quality

SSDC and SBC work together as part of the Cannock Chase Special Area of Conservation (SAC) Partnership with the aim of ensuring that the integrity of the Cannock Chase SAC is protected and that appropriate mitigation measures are secured in order to ensure development does not have adverse effects on the integrity of the SAC.

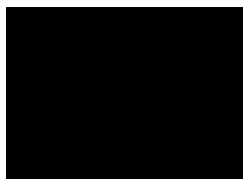
Policy 48 - Cannock Chase Special Area of Conservation (SAC) sets out SBCs approach towards the protection of the SAC. SSDC will continue to work with SBC, Natural England and other partners in relation to visitor impacts from the residents of new development within 15 km of Cannock Chase SAC. It will also continue joint working with SBC in relation to air quality impacts from new development and associated commuting on Cannock Chase SAC and the other protected sites relevant to the Cannock Chase SAC Partnership authorities, including consideration of cumulative and in-combination effects.



Meecebrook Garden Community

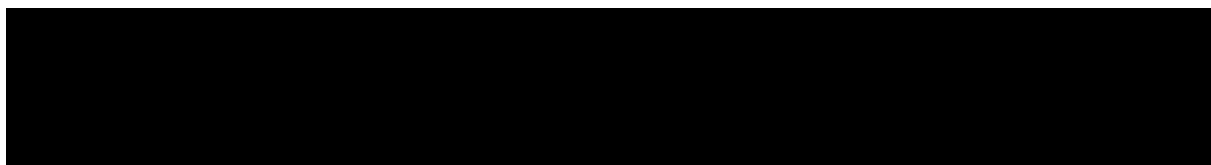
SSDC acknowledge SBC's proposal of a Garden Community at Meecebrook for up to 6,000 homes (3,000 of which are anticipated to be delivered in the plan period). The proposed location of Meecebrook for the Garden Community is some distance away from the South Staffordshire boundary. However, a new community of such a scale may well have potential impacts upon South Staffordshire, we would therefore welcome continued engagement as proposals develop.

Yours sincerely



Ed Fox

Strategic Planning Team Manager – South Staffordshire Council



From: Preferred Options Consultation [REDACTED]
Sent: 18 November 2022 14:48
To: Strategic Planning Consultations
Subject: Preferred Options Consultation - Submitted Response

Full name: **Mark Joynes**

Email: [REDACTED]

Statutory Bodies and Stakeholders

Organisation or Company: **Sow & Penk Internal Drainage Board**

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 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: **Sow & Penk Internal Drainage Board is an independent public authority and drainage authority constituted under the Land Drainage Act; operating under the Land Drainage Act 1991 (as amended) and is a Risk Management Authority under the Flood & Water Management Act 2010. All developments planning work in, on, under or near ordinary watercourses (including piped ordinary watercourses), or discharging surface water into a watercourse within the defined Drainage District require CONSENT from the Board under the Land Drainage Act 1991 (as amended) in addition to, or as part of, any Planning Permission. The Key Constraints for any Development near any Watercourse within the Drainage District can be summarised as follows: • No obstructions above ground within 7 metres of the edge of a watercourse bank top • No increase in surface water discharge rate or volume (or restricted to 1.4 litres per second per hectare) • No obstruction to flow within a watercourse (caused by structures etc.) • Similar Constraints apply to Main River within the Drainage District but as defined by the Environment Agency under Applications for Permits The Sow & Penk IDB defined Drainage District and further information can be found on their website <https://www.shiregroup-idbs.gov.uk/idbs/sow-penk/> and covers an area of approximately 4,581 hectares. We encourage all developers to check if their site falls within a Drainage District and then contact the Board at the pre-development advice stage. If any Development proposes to work in, on, under or near ordinary watercourses (including piped ordinary watercourses), or create or alter surface water discharge into a watercourse then the following Consents would be required from the IDB: Section 23 Consent: LDA prohibits obstructions etc. in watercourses and states “no person shall erect any mill dam, weir or other like obstruction [or] erect any culvert that would be likely to affect the flow of any watercourse ... without the consent in writing of the drainage board concerned.” Section 66 (Byelaw) Consent: 66 LDA provides the power to make byelaws which state that “no person shall ... introduce any water into any watercourse in the District so as to directly or indirectly increase the flow or volume of water ... without the previous consent of the Board [and] no person ... shall erect any building or structure whether temporary or permanent, or plant any tree, shrub, willow ... without the previous consent of the Board, amongst other byelaws specific to each IDB which can be found [3](https://www.shiregroup-idbs.gov.uk/idbs/sow-penk/asset-</p>
</div>
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management-2/planning-consents/ Consent Applications will be determined by the IDB under the Land Drainage Act 1991 (as amended), require both temporary and permanent works applications and the IDB has a statutory 2 month determination period from the day on which the application is made or when the application fee (£50 per application or as prescribed) is discharged, whichever is later. Every person who acts in contravention of, or fails to comply with, any notice served under Section 24 LDA or Byelaws under Section 66 LDA shall be guilty of an offence and liable, on summary conviction to such fines as prescribed within Section 24(3) and/or Section 66(6) LDA. Consent Applications can be found on the website <https://www.shiregroup-idbs.gov.uk/idbs/sow-penk/asset-management-2/planning-consents/> and sent to [REDACTED]. The IDB standard planning response advice is as follows: If the surface water were to be disposed of via a soakaway system, the IDB would have no objection in principle but would advise that the ground conditions in this area may not be suitable for soakaway drainage. It is therefore essential that percolation tests are undertaken to establish if the ground conditions are suitable for soakaway drainage throughout the year. If surface water is to be directed to a mains sewer system the IDB would again have no objection in principle, providing that the Water Authority are satisfied that the existing system will accept this additional flow. If the surface water is to be discharged to any ordinary watercourse within the Drainage District, Consent from the IDB would be required in addition to Planning Permission, and would be restricted to 1.4 litres per second per hectare or greenfield runoff and no increase in volume. No obstructions within 9 metres of the edge of an ordinary watercourse are permitted without Consent from the IDB

Environment Policies

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

Comments: **No reply**

Connections

Q13 - Do you agree with policies? **Yes**

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

From: [REDACTED]
Sent: 07 December 2022 15:09
To: Strategic Planning Consultations
Subject: FW: Stafford Riverway Link Project- Inclusion in Stafford Borough Plan 2020-2040
Attachments: SRL CIC response to SBC Local Plan.docx

From: Stafford Riverway Link Stafford Riverway Link [REDACTED]
Sent: 07 December 2022 14:25
To: [REDACTED]
Subject: Re: Stafford Riverway Link Project- Inclusion in Stafford Borough Plan 2020-2040

Dear [REDACTED]

I have just submitted the SRL CIC comments through the SnapSurvey link on the SBC website.

Just in case there's a technical glitch (or incompetence on my part) I have attached a summary of it.

Kind regards,
Clive

Clive Cropper
SRL Committee Member

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

Do you agree with these policies?

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: Policy 22 Canals Pages 70 & 71

In the current Plan for Stafford Borough 2011-2031, the final paragraph, 9.29 of Policy E7, Canal Facilities and New Marinas, states that the Stafford Riverway Link Community Interest Company has been established to promote the restoration of the historic canal and river link from the Staffordshire and Worcestershire Canal to Stafford Town Centre.

The proposed Town Plan 2020-2040 does not mention this at all in the Policy 22, Canals Section. This is despite significant progress being made by SRL CIC since, in November 2020, obtaining SBC Planning Approval for Phase 1 of the project, which is to restore the mooring basin adjacent to the Staffs. and Worcs. Canal at Baswich and then construct a bridge for walkers and farm traffic over the new opening between the Basin and the Canal.

The Basin work, which is now nearing completion, has been undertaken over a number of years entirely by skilled and unskilled volunteers. It has been supported by numerous local businesses and organisations including; Stafford Borough Council Community Fund, Breedon Group, the Finney Family of Amerton Farm, Huws and Gray, Jewsons, Faserbeton, Amey, Risual, River and Canal Rescue, Titanic Brewery and the local community via a Crowdfunding appeal.

Alongside this work, SRL CIC have also been undertaking significant environmental and ecological activities around the site such as tree planting, hedgerow planting and creating wildflower and herb beds in conjunction with the Woodland Trust, Stafford Soroptimists and the Veolia Staffordshire EnviroGrant Fund.

In addition, a Partnership Agreement is being developed with NSCG Stafford College that will enable students from their construction and engineering courses, among others, to develop their skills on the SRL project sites supervised by their tutors.

The Project is also gathering an increasing number of supporters from the Stafford community with its Facebook following now in excess of 15,000 people. It is no longer Stafford's best kept secret.

An acknowledgement of this remarkable effort would therefore be appreciated, as would a reference to the remaining Phases of the project. Phase 2, which has been discussed with the Canal & River Trust team who are leading the HS2 funded Connecting Towpaths project (between Gt. Haywood, Tixall and Milford), will create a footpath between the Basin at Baswich and the existing River Sow walkway from the town centre that ends at Fairway Bridge. To support this, positive initial discussions have taken place with Groundwork, who are managing the community funds on behalf of HS2, for a funding application to be made by SRL CIC.

This footpath would be suitable for walkers, cyclists and for people with mobility issues. This would greatly contribute towards the health and wellbeing of the local community. Its construction would meet the criteria specified in the proposed Canals Section of the Local Plan, for example, it will adhere to the National Green Belt Policy, improve public access and will not have an adverse effect on water quality.

Phase 3 of the Project will see the environmentally, ecologically and bio-diversity sympathetic restoration of the River Sow, undertaken in a gradual process over several years (as has previously been discussed informally with the Environment Agency), ensuring that it dovetails in with the Penk and Sow Countryside Enhancement Area. Once complete, it will make the River Sow once again accessible for canal boats as in the 1800s and early 1900s.

The plans, currently in outline form only, will ensure that the development is appropriately flood resilient and resistant with safe access and escape routes where required and that residual risk can be safely managed. If appropriate, an assessment of the impact of climate change using appropriate climate change allowances over the lifetime of the development will be produced so that future flood risk is taken into account. There is no timescale for this Phase as significant planning and collaboration with organisations such as the Environment Agency will be required, as will substantial funding.

To see the project completed, Phase 4 will consist of constructing a lock and towpath from the Mooring Basin with a connecting link to the Rivers Penk and Sow, thereby completing the link to the river route towards the Town Centre. Again, planning approval from the Borough Council and funding will be required in order to expedite the work required.

In conclusion, the Inland Waterways Association have recently summarised the benefits that waterways can bring to a community. These include; contributing to economic recovery, encouraging increased spend in local communities and facilitating savings for the NHS and social care through improved physical and mental health and wellbeing. They enhance and improve the natural environment and improve sustainability and help combat climate change. Finally, they protect heritage, connect communities and provide opportunities for education, young people and create jobs, training and apprenticeships.

There is increasing local support for this project. Similar support and recognition by Stafford Borough Council would be a great benefit to seeing it completed at some stage during the lifetime of the new Local Plan.

12 BENEFITS OF BRITAIN'S WATERWAYS



There are 5,000 wonderful miles of navigable waterways in mainland Britain. Ongoing regeneration of these canals and rivers, along with bringing a further 500 miles of currently derelict waterways back into use, will provide many benefits.



Economic

1. Contribute to economic recovery
2. Encourage increased spend in local communities
3. Facilitate savings to the NHS and social care budgets



Natural & Built Environment

4. Enhance and improve the natural environment
5. Protect heritage for future generations
6. Improve sustainability and help to combat climate change



Local Communities

7. Connect communities
8. Provide opportunities for education and young people
9. Create jobs, training and apprenticeships



Improving People's Lives

10. Encourage improved physical health
11. Improve mental health and wellbeing
12. Create better places to live

Visit our website to discover more benefits of the waterways:

WATERWAYS.ORG.UK/WATERWAYSFORTODAY

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

Full name: **Philip Murphy**

Email: [REDACTED]

Statutory Bodies and Stakeholders

Organisation or Company: **Staffordshire and Stoke-on-Trent ICB**

Age: **No reply**

Added to database: [REDACTED]

Topics (Contents page): **Vision and Objectives**

Vision and Objectives

Q1 - Which 3 are most important to you? Contribute to Stafford Borough being net zero carbon by ensuring that development mitigates and adapts to climate change and is future proof., To deliver infrastructure led growth supported by accessible services and facilities. and To provide an attractive place to live and work and support strong communities that promote health and wellbeing.

Development Strategy and Climate Change

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

Policy 1 (Development Strategy): **Yes**

Comments: **The development strategy is predicated upon the Stafford Borough Economic and Housing Development Needs Assessment 2020 (EHDNA) with a focus on providing housing to support the core employment growth forecast, also accounting for a further 2,000 homes as a contribution to the unmet needs of other authorities in the region. This approach is stated as being ambitious but deliverable and allows for a strong bounce-back from the COVID- 19 pandemic and represents an increase in the housing delivery target set out within the currently adopted plan 2011-2031. There are no objections in principle to the approach set out within this strategy and the approach taken in respect of focusing sources of supply within the main centres for employment and facilities (Stafford 59%; Stone 7%) would appear a sustainable strategy. However, to support sustainable communities, key infrastructure must keep pace with planned growth and in this respect further comments are provided in later sections of this response to provide the local context in respect of health infrastructure. It is also noted that Meecebrook Garden Community is intended to provide the location for unmet housing need from other**

authorities, with the strategy setting out a headline delivery total of 3,000 homes within the plan period. The supporting text suggests that Meecebrook will be of a scale capable of delivering its own infrastructure. Comments are provided in a later section of this response setting out the position in respect of delivering healthcare infrastructure for the units anticipated within this plan period.

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

Comments: **Subject to comments within this response in respect of capacity and future delivery of infrastructure to serve Meecebrook Garden Community.**

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

Comments: **N/A**

Policy 4 (Climate change and development requirements): **Yes**

Comments: **Reducing emissions within the NHS estate will be vital in achieving the NHS's commitment to reach Net Zero (Delivering a Net Zero National Health Service, October 2020), with trajectories and actions for the entire NHS to reach net zero carbon emissions by 2040 for the emissions it controls directly and by 2045 for those it can influence. Staffordshire and Stoke-on-Trent ICS Green Plan: Strategy towards Net Zero - launched in 2022 and aligns to the key objectives of this policy. Building energy makes up a substantial proportion of the NHS carbon footprint and work is underway to identify alternatives for reducing energy consumption. At paragraph D there is reference to a scenario in which residual energy demand could be met by means of offsite renewable energy generation where onsite generation is not technically feasible. Can the authority expand on how they envisage this could be measured and objectively assessed by the LPA in respect of determining an application in the event where the procurement of offsite generation may also not be feasible?**

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

Comments: **N/A**

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

Comments: **N/A**

Meecebrook Garden Community

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

Comments: **The ICB do not seek to question the need for the development in meeting housing growth pressures with Policy 1 (Development Strategy) explaining that the garden community is intended to deliver the unmet housing need from other authorities. However, it is understood that a garden community should be self-sustaining, hard-wiring key qualities such as development at a 'Sustainable scale' into the principles from the outset. Policy 7 suggests the provision of at least 3,000 new homes within the plan period with potential future development beyond the plan period (30-year period for development) for at least 6,000 new homes. Sub-paragraph D of this policy also sets out that the settlement shall include a mixed-use town centre, which shall incorporate a health care facility with GP, dentist and pharmacy, although the supporting text to Policy 7 does not explicitly consider healthcare infrastructure to be 'critical strategic infrastructure' needed**

to make the development sustainable and deliverable. Is it intended that sub-paragraph L is a closed list and that these elements are the catalysts alone for a sustainable and deliverable community? The supporting text shows that Policy 7 will need to be read alongside Policy 8 and an indicative infrastructure delivery schedule to appear at Appendix 9 - the documents are shown to be under preparation and will be available at Regulation 19 stage. It is the delivery of healthcare infrastructure and the scale of the development set out at this stage which these comments focus upon: At the first meeting of the Meecebrook Garden Community Health and Wellbeing Thematic Group (MGCHWTG) held on the 24th March 2021 it was made clear that the ICB would only consider the delivery of a new Health Centre if the level of population growth supported it. To provide an indication of the level of increase required, at this inaugural meeting it was stated that the ICB would consider a new Health Centre for around 20,000 patients, which translated to around 8,500 new houses. It was also stated at the meeting that the national and local strategy for the NHS, where possible, is to consolidate GP practices into larger Health Hub's where patients can benefit from a much wider range of health and wellbeing services. These Health Hub's generally cater for more than 30,000 patients and offer a range of community health, mental health, outpatient and voluntary sector services. During this initial meeting, the aspiration suggested around 10,000 new houses within the Meecebrook development. As discussions have progressed this figure appears to have reduced to approximately 6,000 houses, with the Preferred Options document now suggesting a figure of 3,000 houses in the new plan period. On this basis a new Health Centre configured solely for this garden community could not be delivered and sustained within this plan period. Consequently Policy 7 as worded and the published video supporting the Preferred Options consultation could be misleading to residents and developers given the uncertainty around delivery. The ICB would reiterate what was stated at the inaugural MGCHWTG meeting that a new Health Centre, (GP Surgery) could only be considered if there were sufficient growth in population i.e. approximately 20,000 patients. The location of the garden community is currently within the influence of the Stone and Eccleshall primary care network (PCN), which contains 3 single practices (The Crown Surgery, Cumberland House Surgery and Mansion House Surgery), which serve a cumulative patient list size of over 33,000. Providing access to these services for a new garden community would require mitigation, the scale of which would need to be determined as masterplanning progresses and consultation with service providers takes place.

Site Allocation Policies

Q4 - Do you agree with the proposed allocations?

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

Comments: **No objection in principle to the delivery of the remaining housing units (2,700), which were allocated for development under the Plan for Stafford Borough (2014). It is noted that sub-paragraph R of Policy 9 underlines a requirement to 'safeguard a site for health provision'. The approach taken in respect of the healthcare estate is to be informed by Strategic Estates Plans for each primary care network. Further clarity in respect of the emerging strategy will be shared with the planning authority in Spring/Summer 2023 thereby enabling further engagement in advance of Regulation 19 stage for the LP. It is however noted that the level of housing planned for the north of Stafford over the plan period would, if not mitigated, result in shortfalls of clinical estate for the impacted primary care network (PCN), primarily Stafford Town PCN in this case.**

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

Comments: **No objection in principle to the delivery of the remaining housing units (1,729),**

which were allocated for development under the Plan for Stafford Borough (2014). It is noted that sub-paragraph P of Policy 10 underlines a requirement to 'secure developer contributions to provide the strategic infrastructure needed to achieve a comprehensive sustainable development'. The approach taken in respect of the healthcare estate is to be informed by Strategic Estates Plans for each primary care network. Further clarity in respect of the emerging strategy will be shared with the planning authority in Spring/Summer 2023 thereby enabling further engagement in advance of Regulation 19 stage for the LP. It is however noted that the level of housing planned for the west of Stafford over the plan period would, if not mitigated, result in shortfalls of clinical estate for the impacted primary care network (PCN), primarily Stafford Central PCN in this case.

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

Comments: **No objection in principle to the delivery of up to 900 dwellings in this location. However, whilst the need for educational expansion is cited the policy does not highlight the need for any requirement to support other forms of strategic infrastructure such as healthcare. It is suggested that this policy should reflect the same approach taken within sub-paragraph P of Policy 10 and underline a requirement to 'secure developer contributions to provide the strategic infrastructure needed to achieve a comprehensive sustainable development'. The approach taken in respect of the healthcare estate is to be informed by Strategic Estates Plans for each primary care network. Further clarity in respect of the emerging strategy will be shared with the planning authority in Spring/Summer 2023 thereby enabling further engagement in advance of Regulation 19 stage for the LP. It is however noted that the level of housing planned in this location would, if not mitigated, result in shortfalls of clinical estate for the impacted primary care network (PCN), primarily Stafford Central PCN in this case.**

Policy 12 (Other housing and employment land): **Yes**

Comments: **No objection in principle to the delivery of the 'Other site allocations' on the basis that these sites are approached on a case-by-case basis at the point of formal submission. Noting sub-paragraph D, which highlights the need for these sites to be assessed in accordance with other policies within the plan and the need for infrastructure to be secured via legal agreements where appropriate; in this regard the ICB assume policy 37 would be applicable in each case in which it is clarified that a planning obligation is a reliable mechanism to secure necessary on and off-site infrastructure (infrastructure defined as including health). As already noted within this response, the approach taken in respect of the healthcare estate is to be informed by Strategic Estates Plans for each primary care network. Further clarity in respect of the emerging strategy will be shared with the planning authority in Spring/Summer 2023 thereby enabling further engagement in advance of Regulation 19 stage for the LP. It is noted that within Appendix 2 that the proforma for two of the 'Other' sites in Stafford considers the need of capacity constraint for some forms of infrastructure (e.g. Education). In so doing this appears to elevate the need for educational infrastructure above that of other forms of infrastructure, is that the intent and seen as the only barrier for the sites to become achievable? If it is not the intention to elevate this constraint above others could that be re-visited within the wording of the plan as sub-paragraph D of this policy would appear to confirm the same point in terms of ensuring that the infrastructure needs of each site are considered fully?**

Site Allocation Policies (continued)

Q5 - Do you agree with the proposed allocations?

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

Comments: **As part of the consultation review UHNM have been made aware of Policy 13 – Local Green Space and site ‘LGS-PO-17 – Land south of County Hospital’. The land in question is held in title by the Trust and recent feasibility options have been carried out considering the future use of this part of the hospital estate i.e. it is seen as the logical option to support the response to growing capacity pressures at the site to ensure the future sustainability of health and care services. Given the housing and employment needs of the local area over the next plan period and the changing health and care needs of an ageing population the estates strategy for the County Hospital site will need to be cognisant of such pressures and similarly plan for the long-term health needs of a growing population. It is noted within the NPPF at paragraph 101 that designation of land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. It is also stated within the topic area of ‘Promoting healthy and safe communities’ that policies should ‘take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community’ and at paragraph 96 the importance of authorities working positively with statutory bodies to plan for the faster delivery of public service infrastructure is highlighted. The land highlighted in this preferred options document, is required by the Trust to plan for future essential health services. The local health economy is not a static one and should this land be designated as green space this will severely restrict the ability of the Trust to plan and provide capacity at the County Hospital site into the future. A very recent example of the need to respond to capacity pressures can be found at the Royal Stoke University Hospital (which is part of the Trust) where in 2021 the Trust had to acquire land adjacent to the hospital (Grindley Hill Court) to provide sufficient infrastructural capacity through the delivery of a new MSCP. The Trust must therefore object to the proposed designation in this case.**

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

Comments: **N/A**

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

Comments: **N/A**

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: **N/A**

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: **N/A**

Housing Policies

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

Comments: **N/A**

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: **N/A**

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: **Policy 24 - Homes for Life** Falls are a common, but often overlooked injury and can have huge consequences for the health and wellbeing of older age groups. Statistics suggest that 1 in 3 adults over 65 and half of people over 80 will have at least one fall a year. The delivery of more accessible and adaptable dwellings will of course go some way to preventing falls within the home and provide a greater degree of independence for an ageing population. Similarly providing minimum standards both internally and externally for all housing will contribute to the prevention of mental health problems and the promotion of recovery as documented within studies (NHS England. Five Year Forward View for Mental Health (2016); Barnes M, Cullinane C, Scott S, Silvester H. People living in bad housing - numbers and health impacts (2013)) therefore the objectives of this policy are supported in principle. Whilst there is no objection in principle to the objective of supporting specialist forms of accommodation as highlighted within sub-paragraph G it should be understood that delivering healthcare within settings such as care homes and extracare facilities requires a collaborative approach between health, social care, voluntary, community and social enterprise sector and care home partners. Research within primary care networks has shown the increased rate of access to care required in such settings is significant. The NHS Long Term Plan commits to rolling out a model of Enhanced Health in Care Homes across England by 2024, with it starting in 2020 following preparatory requirements, which included every care home being aligned to a PCN and every care home having a named clinical lead. The service requires a weekly 'home round' or 'check in' with residents prioritised for review based on multidisciplinary team clinical judgement and care home advice and requirements for holistic health assessments, personalised care and support plan(s). The model seeks to move away from traditional reactive models of care delivery towards proactive care that is centred on the needs of individual residents, their families and care home staff. It should be noted that to deliver such services within concentrated locations there will be, in some cases, the need to consider expansion of primary care estate capacity to accommodate the series of additional roles required to provide the multi-disciplinary team support needed for this service.

Design and Infrastructure Policies

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

Comments: **In the explanatory text to Policy 37 (Infrastructure to support new development) infrastructure is noted to include health amongst other items. The phrase 'without limitation' is used, which is presumably to signal the fact that this is not intended as a closed list of infrastructure items. The ICB would wish to highlight that the term health should also not be seen as a closed list restricted to simply primary care (GPs) as may be the case by some audiences. As of the 1 July 2022 the Staffordshire and Stoke-on-Trent ICS was established and formalised as a legal entity with statutory powers and responsibilities. Statutory ICSs are comprised of two key components: integrated care boards and integrated care partnerships. ICSs depend on collaboration and have a focus on places and local populations as the driving forces for improvement. From the 1 July 2022, the partners of Staffordshire and Stoke-on-Trent's ICS include, inter alia, 25 primary care networks (containing 145 GP practices working across them), 2 major acute hospital trusts, 1 community trust, 2 mental health trusts, 1 ambulance trust and 2 voluntary sector**

networks. To deliver the joined-up support required to meet the needs of the local population, it should be noted that infrastructural requirements can span across these partner services and therefore the term health should be understood in this context from both a policy and decision-making perspective.

Environment Policies

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

Comments: **N/A**

Connections

Q13 - Do you agree with policies? **Yes**

Comments: **N/A**

Evidence Base

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

Comments: **Whilst the Infrastructure Delivery Plan has not highlighted the need for mitigation within healthcare infrastructure in connection with all allocated sites, earlier responses to this consultation have highlighted the deficits that exist in some PCNs at present and therefore mitigation through mechanisms such as developer contributions are to be noted.**

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

Comments: **Whilst not indicating that further evidence is required for advancing the preferred options, responses provided to earlier questions has signalled that the approach to be taken in respect of the primary healthcare estate is to be informed by Strategic Estates Plans for each primary care network. Further clarity in respect of the emerging strategy will be shared with the planning authority in Spring/Summer 2023 thereby enabling further engagement in advance of Regulation 19 stage for the LP.**

General Comments:

No reply

From: Declan Riddell [REDACTED]
Sent: 12 December 2022 09:29
To: Strategic Planning Consultations
Subject: Stafford Borough Council Local Plan - 2020-2040
Attachments: Staffs Chambers of Commerce response to SBC Local Plan 2020-2040 final.docx;
Staffs Chambers of Commerce response to SBC Local Plan 2020-2040 final.pdf

Dear Sir/Madam,

Stafford Borough Local Plan 2020-2040: Preferred Options Consultation

We wish to submit our response to Stafford Borough Council's Local Plan 2020-2040 Preferred Options Consultation.

As discussed with [REDACTED], I have attached a Word version and PDF version.

Kind regards

Declan

Declan Riddell
Stafford Chamber Manager/Policy Adviser

[REDACTED]

(M): [REDACTED]
[REDACTED]



Registered Office: [REDACTED]
Registered in England no. 465975

**Stoke-on-Trent
& Staffordshire**
Growth Hub



The Stoke on Trent and Staffordshire Growth Hub work in partnership with the Staffordshire Business Helpline to provide free business support and advice. Whether you are running a long established organisation or are looking to set up your own business, there are times when you may need expert business advice and support. The Hub will signpost businesses to partner organisations for the advice that they need, whether this is for Skills, People, Funding or Re-location.

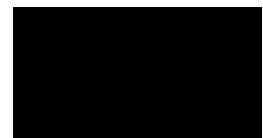
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 **ST.MODWEN** **Staffordshire**
County Council **STOKE**
ON
TRENT
COLLEGE**Staffordshire**
Chambers of
Commerce.

Our ref: SW/dr:

Response to Stafford Borough Council Local Plan 2020-2040

12 December 2022

Dear Sir/ Madam,

STAFFORD BOROUGH COUNCIL LOCAL PLAN 2020-2040

We wish to comment on the recently published documents 'Local Plan 2020-2040' for Stafford Borough. We feel that the plan fails to address the decreasing younger population, adds only the minimum of employment land suggested and does not address in any way the opportunities brought by the arrival of HS2.

During last month's Stafford Chamber Local Area Board meeting, we received an update from Alex Yendole (Strategic Planning & Placemaking Manager, Stafford Borough Council), regarding 'Stafford Borough Council Local Plan 2020-2040'. Mr Yendole also provided an update at our Chamber Planning & Infrastructure Forum meeting. We wish to make the following observations regarding the above.

Stafford Borough Council's Local Plan 2020-2040, is now at the 'Preferred Options' stage and this comes at a time when there has been a reduction in employment land across Stafford Borough. This is something we have previously raised with Stafford Borough Council.

The opening of the Institute of Technology (IoT) at the Stafford Campus of Newcastle & Stafford Colleges Group (NSCG), will be a welcome addition to the town. Conveniently located in the Station Gateway development, we hope that the IoT will be a catalyst for growing start-up enterprises and giving young entrepreneurs the drive to base their businesses in Stafford.

Stafford Station Gateway has the potential to transform the centre of Stafford, bringing high value and well-paid jobs into our County Town. The proposals for the Gateway (outlined in 'Stafford Station Gateway Strategic Regeneration Framework') include 33,000 sq. feet of Grade A office space. Our findings would suggest that this volume of space would equate to a capacity which would house less than 500 workers. Proposals in the same document include creation of smaller workspaces of up to 106,000 sq. feet. We feel that this will result in a lower-than-expected capacity for business and jobs.

Stafford Station Gateway is a once in a generation opportunity to bring people into Stafford and reverse the decades long trend of Stafford being a dormer town. The development of Newcastle & Stafford Colleges Group (NSCG) Institute of Technology, should serve as a driver to attract professional services roles into Stafford but the Gateway development seems to have more of a focus on housing than developing a sufficient space for business accommodation.

We are concerned that a decision to refocus land from employment to residential at the former rugby club site, is a worrying indication of the focus of the plan. The supporting documentation talks of 6,500 jobs in the Gateway yet recently produced plans do not demonstrate this capacity.

On reviewing 'Stafford Borough Council Local Plan 2020-2040', we have been unable to find any detailed strategy which will encourage the next generation of entrepreneurs to locate within the Borough and stem the stream of enterprise moving out of the area. We feel that more needs to be done, in order to bring businesses into the centre of Stafford, ranked as number 1 in the Settlement Hierarchy of Centres. We would like to see the development of thriving and connected business hubs in the centre of Stafford, to encourage professional services businesses to move into the County Town.

We would welcome clarification of what measures will be taken to create employment land within the urban centre of Stafford and how this could be split between uses by public sector, office/business accommodation and retail premises. This links with point 1.15 – *The plan supports the following opportunities and priority interventions highlighted in the Stoke-on-Trent and Staffordshire Local Enterprise Partnership Local Industrial Strategy:*

- *The opportunity to improve the centre of Stafford to attract professional and business services firms, and digital firms, building on current strong connectivity and the future opportunity created by HS2.'*

Greater footfall into Stafford will drive trade at some of our grassroots traders, such as dry cleaners and food/beverage retailers. We would hope that having more businesses in town may lead to more residents getting to and from work by bus and train, linking with net zero aspirations. Electric powered public transport to central locations has to be a more practical means of getting to and from work, rather than queues of congestion to and from outlying business premises, such as Staffordshire Technology Park

With exceptional transport connectivity, Stafford has the potential to attract both fledgling and established enterprises and build a reputation as a home for professional service businesses, such as digital, marketing and public relations. Bringing younger entrepreneurs into the Borough will serve as a key driver for future regeneration and prosperity.

It is important to note that the evidence report notes a reduction in the younger population over recent years and it must be an important objective of the plan to develop jobs for the younger generation

The economic landscape has shifted since the start of the pandemic, with many businesses offering hybrid working solutions for their employees. During the course of the working week, commuters can be seen leaving Stone and Stafford Stations, heading to Birmingham, London and Manchester but we would like to see more being done to switch the perception that our Borough is serving as a dormer base for these conurbations. We would like to see businesses moving out of these conurbations and using Stafford Borough as a base.

Stafford enjoys exceptional rail connectivity with four of the UK's largest conurbations in London (1hr 20 minutes, reducing to 1hr when HS2 arrives), Birmingham (30 mins), Liverpool and Manchester (1hour). We would like to see more being done to seize the opportunities presented by such outstanding rail connectivity, to bring professional services jobs into the centre of Stafford.

Stafford has its fair share of empty commercial premises but some of these could serve as perfect hubs for businesses, helping both fledging and established entrepreneurs to have a base in the centre of Stafford.

Stafford Borough Council's Local Plan 2020-2040 includes comparisons with other areas of Staffordshire but we would suggest that such comparisons need to go beyond the county boundary, as Stafford Borough closely borders the West Midlands conurbation and enjoys outstanding rail and road connectivity with some of the UK's major conurbations. Any ambition to support the growth of Stafford Borough, should look beyond the immediate area and have a wider focus.

The Local Plan document outlines a set of objectives, which include net zero, economic growth and strengthening town centres. Future development of employment land is earmarked at Redhill and Seighford, on the outer edges of urban Stafford.

Both Redhill and Seighford are out of town sites. Whilst Redhill benefits from close proximity to the A34/J14 of the M6 and a bus route, the same can't be applied to Seighford. The only means of getting to and from Seighford is by car and that would appear to go against any "green ambitions", adding to the number of vehicle movements in a rural part of the Borough. Businesses will be attracted by a mix of locations but having the option to locate in the centre of Stafford will be of real appeal.

Whilst we welcome the aspiration to protect and develop employment land for future industrial development, we feel that there will be a need for more brownfield land across the Borough, if businesses are to move into the area.

The penultimate paragraph of pg. 14 in the Local Plan document states:

'Stafford Borough has a relatively strong economy.....Skill levels are relatively high, with 52.9% of residents having NVQ level 4 qualifications or above compared to 43.1% of the population of Great Britain. The average earnings of borough residents are higher than the West Midlands and England averages. But the average earnings for jobs in the borough are below the averages for the West Midlands and England.'

We feel that this paragraph highlights a very skilled local population yet wages for jobs in Stafford Borough are below average at both a regional and national level. This is why we feel it's so important to address this by ensuring that we have the right conditions to attract businesses into our Borough, particularly high value and well paid roles.

We hope that the infrastructure around the Stafford Station Gateway, particularly Stafford Station, will be ready and future proofed, with electric vehicle charging points and good onward transport links.

On the topic of electric vehicle (EV) charging points, we hope that the future proofing of such infrastructure, will be rolled out across the centre of Stafford and the wider Borough. The UK Government has pledged to scrap the sale of new petrol and diesel cars, by 2030. During the next seven or so years, more drivers will be buying electric vehicles and this needs to be supported through an adequate infrastructure of EV charging points, giving drivers the confidence to make the switch. EV charging technology is continually evolving but this shouldn't be a reason to delay the addition of new charging infrastructure.

When he met with our Stafford Chamber Local Area Board, Mr Yendole said that Stafford Borough Council sees the importance of green recovery and said that 'Local Plan 2020- 2040', will serve to encourage greener businesses to move to the area. Having an attractive portfolio of town centre business space, with excellent public transport connectivity, will help with this aim.

We would welcome further clarification of targets within the Local Plan document. Policy 1- Development Strategy A states:

'In the period 2020 to 2040 provision will be made for: 1. 10,700 new homes (535 new homes each year); and 2. at least 80 hectares of new employment land.'

Is there any clearly defined link between the numbers of new homes being built and the amount of new employment land?

With the evidence base suggesting a future need of between 68-140 hectares of employment land, we would welcome clarification of why the selected option of 'at least 80 hectares of new employment land', sits in the lower decile of values.

A significant amount of the overall land allocation (15 hectares), will be allocated to the new garden community at Meecebrook, which will require major infrastructure support, given its rural location 10 miles north west of Stafford.

The proposed commercial development of the Four Ashes site in the south of the county, will have significant implications for Stafford Borough, with employment opportunities being created outside the Borough and we are concerned by any reduction in allocated land for commercial development in Stafford Borough.

Proposals to develop employment land will always be welcome but it will be essential to ensure that this land has the infrastructure in place, to support this development. We have evidence of local businesses who wish to offload surplus energy generated by solar panels, over to the National Grid. These requests have been rejected by power providers, due to a lack of necessary infrastructure. The power providers have invited the companies to consider meeting the eye-watering cost of providing the infrastructure, which seems very unfair and goes against the benefits of using this surplus energy. Failure to address this will hold back investment in our area.

In summary, we welcome Stafford Borough Council's aspirations to protect employment land allocation but overall, we feel that the amount of future employment land allocation is insufficient to support an optimal balance to drive economic activity and prosperity across the Borough. We would particularly like to see more being done to attract younger entrepreneurs into Stafford Borough.

Stafford Town Centre has exceptional rail and road connectivity and could become a thriving hub for professional services businesses. More businesses in our town centres generates footfall and brings a welcome upturn for our hard-pressed retail and hospitality businesses.

Building on this exceptional rail and road connectivity, there is the opportunity to stem the flow of commuters leaving the Borough each morning and bring workers into professional and high value roles.

Staffordshire Chambers' of Commerce is the voice of the business community in Stafford Borough and across Staffordshire. With more than 300 member businesses across Stafford Borough and more than a further 900 member businesses across the county and beyond, we represent our members' views on the local, regional and national issues affecting their businesses.

We're proud to represent such a diverse business community across the area, home to some world-renowned brands and a great place to do business.

If you have any questions, my colleague (Declan Riddell), will be happy to hear from you:

[Redacted]

Yours sincerely,

[Redacted]

Sara Williams,

CEO, Staffordshire Chambers of Commerce

Yours sincerely,

[Redacted]

Martin Lennon,

President, Stafford Chamber of Commerce

From: Preferred Options Consultation [REDACTED]
Sent: 12 December 2022 10:05
To: Strategic Planning Consultations
Subject: Preferred Options Consultation - Submitted Response

Full name: **Mark James**

Email: [REDACTED]

Statutory Bodies and Stakeholders

Organisation or Company: **Staffordshire Moorlands District Council**

Age: [REDACTED]

Added to database: [REDACTED]

Topics (Contents page): **General Comments**

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: **Not asked**

Comments: **Not asked**

Site Allocation Policies

Q4 - Do you agree with the proposed allocations?

Policy 9 (North of Stafford): **Not asked**

Comments: **Not asked**

Policy 10 (West of Stafford): **Not asked**

Comments: **Not asked**

Policy 11 (Stafford Station Gateway): **Not asked**

Comments: **Not asked**

Policy 12 (Other housing and employment land): **Not asked**

Comments: **Not asked**

Site Allocation Policies (continued)

Q5 - Do you agree with the proposed allocations?

Policy 13 (Local Green Space): **Not asked**

Comments: **Not asked**

Policy 14 (Penk and Sow): **Not asked**

Comments: **Not asked**

Policy 15 (Stone Countryside): **Not asked**

Comments: **Not asked**

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: **Not asked**

Comments: Not asked

Q7 - The Stafford Borough Plan proposes policies around the town centres uses, agriculture and

forestry development, tourism development and canals. Do you agree? **Not asked**

Comments: **Not asked**

Housing Policies

Q8 - The local plan proposed a policy (23) on affordable housing. Do you agree? **Not asked**

Comments: **Not asked**

Q9 - The local plan proposes a policy (30) to help meet identified local need for pitches for Gypsies and Travellers. Do you agree? **Not asked**

Comments: **Not asked**

Q10 - The local plan proposes policies around homes for life, rural exception sites, new rural dwellings, replacement dwellings, extension etc. Do you agree? **Not asked**

Comments: **Not asked**

Design and Infrastructure Policies

Q11 - Do you agree with policies? **Not asked**

Comments: **Not asked**

Environment Policies

Q12 - Do you agree with policies? **Not asked**

Comments: **Not asked**

Connections

Q13 - Do you agree with policies? **Not asked**

Comments: **Not asked**

Evidence Base

Q14 - Have we considered all relevant studies and reports? **Not asked**

Comments: **Not asked**

Q15 - Do you think there is any further evidence required? **Not asked**

Comments: **Not asked**

General Comments:

The Local Plan Preferred Options document is considered to be positively prepared, clear and underpinned by extensive evidence. The plan does not present any overriding concerns in relation to Staffordshire Moorlands. In particular, it is noted that Stafford

Borough's own development needs are to be met in full, the majority of planned growth is to be located some distance away from the Staffordshire Moorlands HMA and it is not dependent on Green Belt release. A signed copy of the Duty to Co-operate Protocol & Checklist between SMDC and SBC has been forwarded on to you separately. We look forward to continued engagement as your plan progresses and on wider plan-making matters moving forward.

From: Kuldeep Tanda [REDACTED]
Sent: 12 December 2022 10:33
To: Strategic Planning Consultations
Subject: Staffordshire Police comments for the Stafford Local Plan
Attachments: Staffordshire Police response to The Stafford Local Plan 2020 - 2040.docx

Good morning

Please find attached my comments on behalf of Staffordshire Police for the Stafford Local Plan 2020 – 2040.

Kind Regards

Kully Tanda
Designing Out Crime Officer

Specialist Crime Command
Public Protection Unit



Staffordshire Police
[REDACTED]

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www.staffordshire.police.uk



Strategic Planning and Placemaking
Stafford Borough Council
Civic Centre
Riverside
Stafford
ST16 3AQ



Email: [REDACTED]

Date: 12/12/22

Dear Sir or Madam

RE: Stafford Local Plan 2020 - 2040

The proposal has been reviewed with particular reference to Police CPI's Secured by Design guidance and in accordance with the recognised principles of Crime Prevention Through Environmental Design.

The following comments should be considered in the light of the following:

- Under the heading Promoting Safe and Healthy Communities, Para 91(b) of the NPPF states "Planning policies and decisions should aim to achieve healthy, inclusive and safe places which are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion."
- Under the heading Achieving Well-Designed Places, Para 127(f) of the NPPF states "Planning policies and decisions should ensure that developments create places that are safe ... and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience."
- Under the heading Planning Should Address Crime Prevention, Design Para 10 of the NPPG states "Designing out crime and designing in community safety should be central to the planning and delivery of new development";
- Stafford Borough Council guidance in Policy N1 Design: Require the design and layout of new development to be safe, secure and crime resistant, by the inclusion of measures to address crime and disorder through environmental design and meet "Secured by Design" Standards; Paragraph 12.8 of the local plan states developers should ensure that 'Secure by Design' principles are incorporated within all development schemes;
- The statutory obligation placed on local authorities to do all they reasonably can to prevent crime and disorder in accordance with Section 17 of the Crime and Disorder Act 1998;

I recommend the Designing Out Crime Officer at Staffordshire Police is consulted at all stages of the consultation, so we can ensure the principles of Crime Prevention Through Environmental Design (CPTED) are incorporated into the designs and development.

Please note that any pedestrian footpaths, bridleways and cycle paths should allow for natural surveillance.

Policy 4 – Climate change

- I appreciate the need to incorporate climate control measures throughout all future developments.

- It is important that EV charging points are installed on all properties, and apartment blocks have an EV charging point within the parking court, as well as industrial estates and businesses futureproofing for the increase of electric and hybrid vehicles in the future.
- Please note, if businesses wish to install photovoltaic (PV) panels, they should install these on the roof, as there has been a national rise in theft of PV panels and the cabling.

Policy 7 – Meecebrook Garden Community

- D2 & F– the town centre should have the capacity to add additional shops for the future. The provision of smaller retail areas will be welcomed, and provide a safe environment if retail units and community centres are located within the same area.
- D3 – for a village of potentially 6000 residents, one health care facility, dentist and pharmacy may not be enough. The local NHS services should be consulted. Please remember adequate parking facility will also be required, as most patients will be driven to the facilities.
- D5 – a place of worship for the garden community. Which faith group will be provided for? Will you be providing a suitable plot of land if different faith groups wish to build community facilities for their faith.
- G – new proposed railway station. I believe the BTP DOCO will have a lot of influence in the security of the station and the car park, cycle storage facilities and CCTV coverage. They will also look at suicide prevention measures if a bridge will be incorporated into the design.
- The walking and cycling routes to and from the railway station, should be wide paths, preferably with a clear line of sight to eliminate the fear of crime.
- H – School provisions. The safety of the pupils will be incorporated into the design of the schools. I acknowledge, the design of the garden community is to encourage walking children to school, but in reality, parents are dropping off their children on the way to work, so will be driving. Parent parking at drop off and picks should be considered, as anti-social parking may lead to community tensions, and complaints to the school, the council, the local MP, and the police.
- I & J – I understand the development will include the area which are currently the popular facilities for the football and rugby clubs within the area. I believe one club received funding to help improve the facilities. **Policy 39** of this local plan refers to protecting the community facilities. I recommend the club members are consulted throughout. Can the garden community be incorporate the existing club facilities into the development plans? If not, will the clubs be provided with a like for like grounds and facilities? The clubs are very popular, and encourage the youth and adults into sport and exercise and integrate within the community, which is what the garden community encourages.
- Play areas should be located where they will have natural surveillance, from the community and residents (if appropriate), the play area should not be positioned away from the natural footfall of the dog walkers and joggers. Play areas are vulnerable to crime and being damaged, the result of this abuse is that the investment in a play area, its use, and contribution to the quality of life in the community can be seriously eroded.
- An evaluation of the needs of the community should be addressed prior to implementation of this area and it is important when carrying out a post implementation evaluation of crime or anti-social behaviour (ASB) of this facility to separate incidents around the play area i.e. roads, parking areas, drinking in the street, dwelling frontages, etc. from those which actually occur within it, part of any ASB evaluation should include how many perceived ASB incidents are attributed to estate families and incidents attributed to non-resident families.
- I use the word “perceived” because when a play area is being used to play or otherwise engage a young person this usually generates a certain amount of noise, this by itself is not anti-social – its noise.
- Public Rights of Way (PRoW) must be maintained to encourage the community to walk and enjoy the local environment. The PRoW should have good natural surveillance, with properties frontages overlooking the PRoW, and should not run behind residential or businesses properties.
- Frequent benches can help those with mobility difficulties to walk more easily between places.
- The garden community will encourage less use of private vehicles, and more walking, and the use of public transport. The garden community should have suitable accessibility to public transport for the elderly community, i.e. conveniently located bus stops, with a regular bus service, not limited to one an hour, which will discourage the use of public transport.

- Lighting is essential throughout the garden community. A lighting engineer should be consulted, to provide adequate lighting to provide the community a sense of security.
- I have been invited to join the consultation meeting for the Meecebrook Garden Community, so I will be able to comment as the development plans progress.

Policy 9 – North of Stafford

- The Marston development is currently in construction, with Staffordshire Police consulting at each phase and application submitted to the planning department.

Policy 10 – West Of Stafford

- The Burleyfields development is currently in construction, with Staffordshire Police consulting at each phase and application submitted to the planning department.

Policy 11 – Stafford Station Gateway

- A1 - I understand making the connection through to Castle Street from the Station Gateway a bus-only route. At what stage will this be actioned, as soon as the roads can access Unicorn Way? I recommend a pedestrian path/ cycle path are incorporated into the design of the bus lane, to allow safe passage for both pedestrians and cyclists alike.
- **Building for a Healthy Life states:** Well-designed developments will make it more attractive for people to choose to walk or cycle for short trips helping to improve levels of physical activity, air quality, local congestion and the quality of the street scene. Well-designed streets will also provide sufficient and well-integrated car parking.
- A3 – A new station entrance will be beneficial for those who walk to the station, as well as those utilising the new multi-storey car park.
The multi-storey car park must install anti-suicide measures. This new MSCP will be in close proximity to St Georges Mental Health hospital. There have been recorded incidents where a vulnerable patient, who have been discharged from St Georges has gone straight to the Waterfront Car park in an attempt to commit suicide. The latest incident in the summer, a negotiator was involved in trying to bring the vulnerable person safely within the car park grounds. We are currently trying to work on improving the safety of the Waterfront car park, to prevent further attempts. It will be more cost effective to incorporate security and safety measures into the design rather than retrofitting the MSCP.

Policy 23 – Affordable Housing

- **Building for a Healthy Life states:** A mix of housing types and tenures that suit the needs of the local community. This may include first time buyer homes, family homes, homes for those downsizing and supported living.
- C - Affordable homes should be evenly dispersed throughout the development, and not grouped together in large numbers.

Policy 30 – Gypsies and Traveller and Travelling Showperson Accommodation

- **DCLG Good Practice Guide 'Designing Gypsy and Traveller Sites' (May 2008)** states that there is no one ideal size of site or number of pitches, although experience of site managers and residents alike suggest that a maximum of 15 pitches is conducive to providing a comfortable environment which is easy to manage. Smaller sites of 3-4 pitches can also be successful, particularly where designed for one extended family. The guidance goes on to say that sites should consist of up to 15 pitches unless there is clear evidence to suggest that a larger site is preferred by the local Gypsy or Traveller community.

Policy 38 – Electronic Communications

The provision of an electronic infrastructure is essential for businesses as well as residents.

Please note there is a tendency to build 'Smart' villages. However, there are risks associated when 'Smart' devices are used, and the appropriate security measures are not installed. There is a danger

for highly sophisticated Cyber Crime to be committed. Cyber Crime is on the raise, with the perpetrator being sat anywhere in the world.

Policy 39 – Protecting Community Facilities

Please note the sport fields which are currently located in the proposed Meecebrook Garden Community.

Crime Prevention

The local plan only mentions 'Crime' once throughout the plan. It is imperative the council requests crime prevention is considered with all aspects of the design and development stage, for both residential and commercial properties, and well as in **Policy 34** for Urban Design General Principles. Nationally there is an importance in providing a safe environment to protect against Violence against Women and Girls, this has not been incorporated into your local plan.

Secured By Design

I request your local plan advises developers work to the principles of Secured By Design (SBD) and Crime Prevention Through Environmental Design (CPTED) to help reduce crime, and provide a safer environment.

They do not have to apply for an SBD accreditation, but working to the principles will ensure security is considered at the design stage. Many housing associations do apply for an SBD accreditation.

It is recommended that the development should be built to Secured By Design Standards (SBD), which considers security within the design of any development. Guidance can be found in the Secured By Design Homes 2019 or Commercial 2015 V2 guide [SBD Design Guides \(securedbydesign.com\)](http://securedbydesign.com).

Research shows that adopting SBD can reduce burglary by 50%, car crime and criminal damage by 25%, therefore the carbon costs of replacing door-sets and windows on SBD developments as a result of criminal activity is more than 50% less than on non SBD developments, *the cost of installing SBD approved products equals 0.2% of the total build cost.*

One of the most revealing elements of research into SBD is how much 'safer' residents feel if they occupy a dwelling on an accredited development, even if they are not aware of the award status. There are few other initiatives which can deliver a measurable reduction in fear like this.

SBD supports one of the Government's key planning objectives - the creation of safe, secure, quality places where people wish to live and work. SBD applies quality standards to a range of security measures and should be seen as a positive marketing opportunity.

SBD can contribute towards BREEAM assessments.

Kully Tanda
Designing Out Crime Officer
Staffordshire Police

The recommendations contained within this report are the professional statements of the author. As such, they represent what we believe to be the best advice in terms of 'doing all that is reasonable to prevent crime and disorder' under the terms of Section 17 of the Crime and Disorder Act 1998. All comments and recommendations are 'Site Specific'. Crime prevention advice is given free without the intention of creating a contract. Neither do the Home Office or the police service take any other legal responsibility for the advice given.

From: Preferred Options Consultation [REDACTED]
Sent: 08 December 2022 15:27
To: Strategic Planning Consultations
Subject: Preferred Options Consultation - Submitted Response

Full name: **Marek Hornak**

Email: [REDACTED]

Statutory Bodies and Stakeholders

Organisation or Company: **Staffordshire University**

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

Added to database: [REDACTED]

Topics (Contents page): **General Comments**

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: **Not asked**

Comments: **Not asked**

Site Allocation Policies

Q4 - Do you agree with the proposed allocations?

Policy 9 (North of Stafford): **Not asked**

Comments: **Not asked**

Policy 10 (West of Stafford): **Not asked**

Comments: **Not asked**

Policy 11 (Stafford Station Gateway): **Not asked**

Comments: **Not asked**

Policy 12 (Other housing and employment land): **Not asked**

Comments: **Not asked**

Site Allocation Policies (continued)

Q5 - Do you agree with the proposed allocations?

Policy 13 (Local Green Space): **Not asked**

Comments: **Not asked**

Policy 14 (Penk and Sow): **Not asked**

Comments: **Not asked**

Policy 15 (Stone Countryside): **Not asked**

Comments: **Not asked**

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: **Not asked**

Comments: Not asked

Q7 - The Stafford Borough Plan proposes policies around the town centres uses, agriculture and

forestry development, tourism development and canals. Do you agree? **Not asked**

Comments: **Not asked**

Housing Policies

Q8 - The local plan proposed a policy (23) on affordable housing. Do you agree? **Not asked**

Comments: **Not asked**

Q9 - The local plan proposes a policy (30) to help meet identified local need for pitches for Gypsies and Travellers. Do you agree? **Not asked**

Comments: **Not asked**

Q10 - The local plan proposes policies around homes for life, rural exception sites, new rural dwellings, replacement dwellings, extension etc. Do you agree? **Not asked**

Comments: **Not asked**

Design and Infrastructure Policies

Q11 - Do you agree with policies? **Not asked**

Comments: **Not asked**

Environment Policies

Q12 - Do you agree with policies? **Not asked**

Comments: **Not asked**

Connections

Q13 - Do you agree with policies? **Not asked**

Comments: **Not asked**

Evidence Base

Q14 - Have we considered all relevant studies and reports? **Not asked**

Comments: **Not asked**

Q15 - Do you think there is any further evidence required? **Not asked**

Comments: **Not asked**

General Comments:

Reflection from Staffordshire University is that although Objective 2 is 'to develop a high value, high skill, innovative and sustainable economy', the draft policies on economic prosperity, housing, design & infrastructure, environment, and connections seem to be

missing link in the ecosystem to the 'higher skills', which apart from the initial inclusion in the objective 2 is missing. There is a note in the document in relation to schools, but no mention of progression opportunity to higher education within the county and specifically for example, the health provision in Centre for Health Innovation (CHI), which is home to higher education, research, innovation, and enterprise support. There is no mention of higher skills and how Staffordshire University delivers on this part. No mention of CHI in the document just to give a reader a flavour what are some of the unique places in the town, apart from e.g. visitor attractions and green spaces. The document is focused on the space and dwellings (e.g. Meecebrook), commercial spaces and environment, but some mention on how the borough will drive the higher-skills beyond the 52.9% of NVQL4 and above skills would be good. Similarly, no mention on work-based learning and Staffordshire University's high standing in higher & degree apprenticeships, which significantly contribute to the local higher skills provision. The document mentions the inward investment, but we know companies do not move to places which lack good skills and talent pipeline. The focus sector in the town (and county) is in energy, manufacturing, transport, health, etc., and Staffordshire University has skills and R&D specifically for these sectors. What Staffordshire University brings into the local spatial planning and socio-economic growth closes the ecosystem loop, but it's not yet visible in any way in the document(s).

From: Kate Dewey [REDACTED]
Sent: 12 December 2022 11:50
To: SPP Consultations; Strategic Planning Consultations
Cc: [REDACTED]
Subject: Local Plan Preferred Options Consultation- Staffordshire Wildlife Trust
Attachments: Preferred-Options-Consultation-Response-Form SWT 12 Dec 2022.docx

Dear team,

Please find attached our comments.

Regards,

Kate Dewey BSc (Hons) MCIEEM

Senior Planning Officer



Planning consultations- please send to [REDACTED]

P.S. Our planning work is funded mostly by our members - If you'd like to keep me doing what I do, and help us do more, [Please join today](#) or make a donation at <http://www.staffs-wildlife.org.uk/donate>



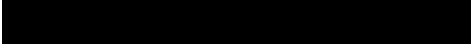
Are you a member of the Wildlife Trust? Less than 10p per day will help us protect and enhance the wildlife and wild places of Staffordshire. [Please join today!](#)

Staffordshire Wildlife Trust Registered Office: [REDACTED]. Registered as a company in England & Wales number 959609. This email and any attachments are confidential, copyright Staffordshire Wildlife Trust (SWT), and intended for the recipient only. SWT accepts no responsibility for information unrelated to its business.

2 Attachments

Contact Details

Full name (required): Kate Dewey, Senior Planning Officer, Staffordshire Wildlife Trust

Email (required): 

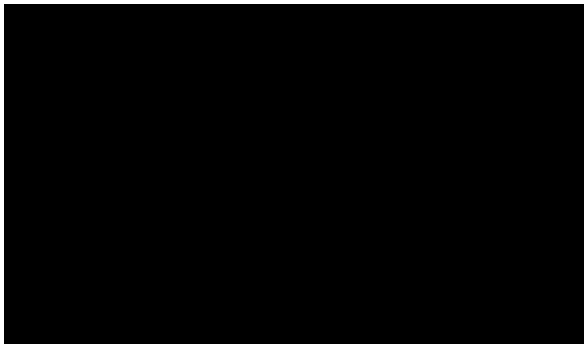
Tick the box that is relevant to you (required):

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

Organisation or Company Name (if applicable):

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 / No

Policy 1 Comments:

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

Yes / No

Policy 2 Comments:

Policy 3. Development in the open countryside - general principles

Yes / No

Policy 3 Comments:

Reference to previously developed land should state 'that is not of high environmental value'.

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?

Yes / No

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:

The proposed site boundary is different to that proposed in the earlier local plan consultation Issues and Options in 2020, and assessed for ecological issues within the Ecological assessment of potential new Local Plan sites using Nature Recovery Network (NRN) mapping and submitted sites Report, carried out in 2021. The area needs to be reassessed and compared in more detail to other options.

The Concept Masterplan shows housing and commercial expansion affecting floodplain areas, and parts of designated Local Wildlife Sites.

It is not clear whether a 10% biodiversity net gain could be achieved within the plans. This should be part of the policy and a high-level calculation carried out to inform the masterplan.

The settlement would impact a large area of the water catchment for the Meece Brook.

The final masterplan and developments should seek to attain Building With Nature accreditation <https://www.buildingwithnature.org.uk/>

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:

The policy should also include achieving a minimum 10% net biodiversity gain across the allocation. It should also seek to buffer, enhance and link Local Wildlife Sites (LWS) within and outside the allocation site.

Any Local Wildlife Sites that have not been re-assessed or monitored within the last 10 years should be updated to ensure their status and boundaries are accurate. The policy, and masterplan, should be updated to ensure it is in line with the current NPPF and environmental policies. A comprehensive habitat survey to identify any irreplaceable or priority habitats, or additional areas worthy of LWS designation, should be undertaken to inform future masterplanning.

Any new development should seek to attain Building With Nature accreditation <https://www.buildingwithnature.org.uk/>

Policy 10. West of StaffordYes / No**Policy 10 Comments:**

The policy should also include achieving a minimum 10% net biodiversity gain across the allocation. It should also seek to buffer, enhance and link Local Wildlife Sites (LWS) within and outside the allocation site.

Any Local Wildlife Sites that have not been re-assessed or monitored within the last 10 years should be updated to ensure their status and boundaries are accurate. For example, Burleyfields Biodiversity Alert Site has been significantly changed by development and the remaining area is likely to warrant a higher designation. New habitats created such as SuDs ponds also need to be assessed to update the biodiversity evidence base. A comprehensive habitat survey to identify any irreplaceable or priority habitats, or additional areas worthy of LWS designation, should be undertaken to inform further masterplanning.

The policy, and masterplan, should be updated to ensure it is in line with the current NPPF and environmental policies.

Any new development should seek to attain Building With Nature accreditation <https://www.buildingwithnature.org.uk/>

Policy 11. Stafford Station GatewayYes / No**Policy 11 Comments:**

Please see our comments submitted to the consultation on the strategic regeneration framework.

The site and masterplan should not be adopted without identifying:

Areas meeting LWS criteria, priority habitats, protected and priority species that require avoidance and mitigation

How 10% biodiversity net gain can be delivered on the site

Whether flooding can be sustainably managed in line with national policy

Adequate accessible greenspace to avoid a net loss of resource

Opportunities and constraints regarding climate change and carbon sequestration

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:

Further evidence gathering regarding ecological and flood management constraints are advisable on certain sites in order to support accurate predicted housing numbers.

Land at Ashflats (STAFMB03)

Grasslands on site may be of higher diversity than currently recorded. If any may be classed as priority habitats, these should be retained if following the mitigation hierarchy and best practice for biodiversity net gain. This should be confirmed before adopting the allocation. The site also experiences significant surface water flooding which may be a constraint requiring a larger area of greenspace to be retained for sustainable drainage.

Land East of Oakleigh Court (STO13)

Woodland/ brook course has potential to be a priority habitat or Local Wildlife Site if assessed, and should be protected and enhanced as a wildlife corridor. Further surveys of habitats recommended to ensure housing capacity is deliverable. This should be confirmed before adopting the allocation.

Land at Trent Road (STO08 and STO10)

Grasslands on site may be of higher diversity than currently recorded. If any may be classed as priority habitats, these should be retained if following the mitigation hierarchy and best practice for biodiversity net gain. Mitigation requirements may affect viability if habitats are high value. This should be confirmed before adopting the allocation.

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:

We support the designation of Local Green Space areas.
It would be desirable within the policy to support the national aim for 30% of land to be managed for nature, by aiming to enhance and manage all LGS sites for nature where this is appropriate/ compatible with the use of the site.

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

Yes / No

Policy 14 Comments:

We support this policy; however we would strongly recommend that the enhancement area boundary is extended slightly to include Kingston Pool Covert (north) LWS and Kingston Pool Covert LNR, and Rowley Grove BAS.

Other stakeholders such as Natural England, Environment Agency, canal and Rivers trust and the National Trust should also be involved in formulating the masterplan and in delivering this.

Policy 15. Stone Countryside Enhancement Area

Yes / No

Policy 15 Comments:

We support this policy; however we would strongly recommend that the enhancement area boundary is extended to link nearby Local Wildlife Sites and existing project areas such as the Scotch Brook and Aston-to Burston trail. Extend the boundary south towards Aston Hall Farm SBI, north to Trent Wood SBI, north-east to take in Radford Wood and Coppice Wood SBI, and west to include Filly Brook (west of Stone) SBI.

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 / No

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:

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:

All new development should seek to attain Building With Nature accreditation
<https://www.buildingwithnature.org.uk/>

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:

POLICY 42. Flood risk

No development should be permitted in Flood Zones 2 and 3, because the function floodplain is required for natural flooding and should form part of a watercourse's surrounding habitat. Development in the floodplain can cause pollution to wash into the water system even if no damage is done to infrastructure.

POLICY 43. Sustainable drainage

Culverted watercourses and piped surface water drains should be deculverted and restored to natural channels to aid flood capacity and habitat restoration, in line with Environment Agency policy and guidance.

POLICY 46. Green and blue infrastructure network

Green infrastructure should be managed for nature where possible, to provide accessible natural greenspace for all residents to meet recognised standards: Accessible Natural Green Space Standards in Towns and Cities: A Review and Toolkit for their Implementation

<http://publications.naturalengland.org.uk/publication/65021>

POLICY 47. Biodiversity

A. Wording should be amended regarding the mitigation hierarchy: 'planning permission will be refused for development that results in significant harm to biodiversity that **could** be avoided (by locating elsewhere), **and that cannot be** adequately mitigated, or (as last resort) compensated for.

F. Sites of local importance should also include undesignated areas that meet Local Wildlife Site criteria for designation. The policy does not mention irreplaceable habitats or priority habitats- these should be included so that all are considered. Corridors and stepping stones within the ecological network also need to be recognised in line with guidance in the NPPF.

The policy does not include protected or priority species- these need to be protected and their recovery encouraged as per guidance in the NPPF (paragraph 179b 'To protect and enhance biodiversity and geodiversity, plans should: b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species;') Gains for species are also best practice when designing Biodiversity Net Gain into schemes.

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:

Data for Local Wildlife Sites is out of date on the policies map, and only Sites of Biological Importance are shown. Biodiversity Alert Sites are also non-statutory sites of local importance. This needs to be updated with the latest site data, obtained from Staffordshire Ecological Record.

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:

It is important to maintain the biodiversity evidence base so that survey data is ideally under 10 years old, particularly in areas of development pressure such as in and around settlements. Ensure that existing Local Wildlife Sites are re-surveyed and that any sites with evidence of high environmental value are assessed against the designation criteria and designated through the Staffordshire Local Wildlife Sites Partnership.

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.

From: Trudy Williams [REDACTED]
Sent: 30 November 2022 15:39
To: Strategic Planning
Cc: [REDACTED]
Subject: Stafford Borough Local Plan 2020-2040 Preferred Options Consultation
Attachments: STC Preferred Options Comments v2.pdf

Good afternoon,

Please find attached Stone Town Council's response to the Stafford Borough Local Plan 2020-2040 Preferred Options Consultation.

I would be grateful if you could confirm that you are able to accept the representation in this format (as an alternative to completion of the online consultation form).

Thank you

Kind regards

Trudy Williams | Assistant Town Clerk | [REDACTED]
Stone Town Council | [REDACTED]
[REDACTED] | www.stonetowncouncil.gov.uk

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RESPONSE TO LOCAL PLAN PREFERRED OPTIONS CONSULTATION

Housing and Distribution

SUMMARY

1. Stone does not have the necessary infrastructure to support the proposed new housing allocation (e.g. doctors, dentists, roads, schools plus other vital services). The Council would like to see the definitive infrastructure improvements to support the town's needs.
2. The proposed development in Walton (Marlborough Road) should be resisted both because Walton has already seen significant overexpansion in the last few years with no accompanying increase in services and because access for the works traffic would necessarily be through the existing housing estates leading to damage to resident's amenity. This new addition would amount to over-intensive development. Air quality would also deteriorate as a result of both the additional proposed development and the fact that Pirehill Lane will be used by HS2 construction traffic as a haul road for their HGVs. There are 3 schools in the area, 1 middle school and 2 first schools, plus 3 nurseries, and a playing field on Tilling Drive. This raises serious concerns about the effect of this level of pollution on the large number of children who would be exposed to it on a daily basis. The environment will be decimated by congested traffic, but there appears to be no Green Plan.
3. The proposed developments on Uttoxeter Road and East of Oakleigh Court will exacerbate the existing delays caused by the railway level crossing on Uttoxeter Road and commuter traffic would inevitably be queuing at peak times. In addition, the mitigation measures required by Network Rail are considerable and costly, and will not address traffic congestion.
4. With reference to points 2 and 3 above, a formal transport assessment should be undertaken, funded by the developer but carried out by an independent organisation. The HS2 transport feasibility reports should be reviewed as part of the process, as the development off Marlborough Road should not be considered in isolation. It should also be considered that the traffic movements between Pirehill Lane and the new developments will mean residents having over five years of development related traffic, in addition to the HS2 traffic movements up and down Pirehill Lane.
5. The proposed Meecebrook Garden Development will also bring more traffic through Walton. A map of the development does not show roads in or out of this development and the town Council would like to know how this will work.
6. Flood risk and alleviation (such as at Oakleigh Court) is not detailed.
7. A current application for up to 130 new homes on Oulton Road should, if passed, be allocated as an SDL and the numbers should therefore be included in the overall requirement for Stone removing need for at least one of the 3 larger proposed allocations. In addition, land off Lichfield Road has

been approved for the development of 21 houses and 5 shops with pedestrian crossing on the Lichfield Road further adding to the stalling of traffic. This development does not appear in the Local Plan and the pedestrianised crossing will not mitigate the additional traffic and delays that regularly occur at the level crossing.

8. The ready acceptance of the desire of Black Country authorities to demand extra housing within Stafford Borough under the 'duty to co-operate' has significant implications and should be carefully reviewed. A reduction of only 10% in requested numbers would allow removal of 2 of the principal proposed developments in Stone.
9. Under the previous Local Plan, Stone had been expected to take 10% of new housing and Stafford 70% a ratio of 1:7. In the Preferred Options, Stone is proposed to take 1: 3 in relation to Stafford. The allocations therefore require revisiting and/or explanation.
10. The proposal includes development of agricultural/farmland that has been farmed for generations. This is against Government Policy when brownfield sites are available.

RATIONALE

Rationale for recommending reductions in proposed housing numbers:

Infrastructure: There is a lack of necessary infrastructure in Stone: Doctors, Dentists, Schools etc

More specifically in relation to the proposed locations:

Marlborough Rd (STO07): There has been intensive recent development to the West of Stone (Walton)...in fact in excess of 600 new homes representing a 20% expansion. This amounts to over intensive development. Access for works traffic would be through the existing housing during construction.

Uttoxeter Rd (STO16): Railway crossing limits ready access to the development and will exacerbate current issues.

East of Oakleigh Court (STO13): Railway Crossing limits ready access and will exacerbate current issues.

Additionally:

1. **A current planning application for 130 homes has not been included in the analysis and if passed should be identified as a Strategic Development Location leading to a proportionate reduction in allocations for Stone.**

22/36231/OUT Stonefield Works Oulton Road Stone Staffordshire ST15 0RS

This outline application calls for the demolition of existing buildings and redevelopment of the site for a residential development comprising of up to 130 dwellings

2. Distribution of housing:

In the table below you can see that when the Meecebrook development is excluded from the distribution percentage that the Stone share of the distribution of housing has increased to 14.6% from 10% in the previous Plan for Stafford Borough (PFSB) 2011-2031 whereas Stafford's has decreased from 70% to 46.5%

Table: Broad spatial distribution of housing

Sources of housing supply 2020-2040 (proportion in brackets)	Completions 2020-2022	Commitments	New allocations/ supply sources	Proportion excluding Meecebrook	PFSB 2011-2031
Windfall (6%)	N/A	N/A	750		
Stafford (59%)	766	5438	1,181	46.5%	70%
Stone (7%)	243	268	370	14.6%	10%
Meecebrook (24%)	N/A	N/A	3,000		
Larger settlements (4%)	84	144	234		
Smaller settlements (<1%)	7	13	N/A		
Rural areas (<1%)	20	62	N/A		
Total	1,120	5,925	5,535		

3. External responses to the Issues and Options consultation

A joint response was received from the Black Country authorities. This response highlighted the functional migration and commuting relationship between Stafford Borough and the Black Country and requested that Stafford Borough Council take between 1,500 and 2,000 homes as a contribution to meeting unmet need in the Black Country. Additionally, the Black Country authorities requested that Stafford Borough consider accommodating 35-40ha of employment land which is unable to be accommodated in the Black Country.

The higher number of 2,000 has been included but without any justification. However the acceptance of the higher number has significant implications for the Borough and potentially for Stone.

The number could be reduced marginally:

1800 homes would still give 525 per year for SBC but with the removal of both:

Land at Marlborough Road (STO07)	101
Land at Uttoxeter Road (STO16)	97

Or

1770 homes would still give 523.5 per year for SBC with removal of:

Land at Marlborough Road (STO07)	101
Land East of Oakleigh Court (STO13)	131

New Local Plan Preferred Options

3. Preferred options for housing and employment land

3.1 This section outlines the council's preferred housing and employment land requirements and the reasons for their selection. That is followed by a summary of the council's reasons for rejecting the alternative options set out in the EHDNA.

Preferred housing requirement

3.2 The council's emerging preferred options is to plan for 535 new homes each year (10,700 new homes 2020-2040). This is a variant on Scenario D in the EHDNA and is referred to as 'Scenario D+'.

3.3 This option could deliver the borough's own housing needs of 435 new homes each year (8,700 homes 2020-2040) calculated in accordance with Scenario D of the EHDNA, together with 2,000 homes as a contribution to meeting unmet need in the sub-region.

Table 4: EHDNA housing growth scenarios

Option	Number of new homes each year
Scenario A Minimum local housing needs. Note rebased local housing need in 2022 is 391	408 (now 391)
<p>Scenario D Cambridge Econometrics jobs growth The number of homes that would be needed to support a Cambridge Econometrics November 2018 projection for jobs growth in the borough, assuming</p> <p>that commuting patterns don't change (i.e. there is no increase in the proportion of jobs filled by people commuting from other areas into the borough nor a reduction in the proportion of economically active residents commuting out of the borough).</p>	435 (489)
<p>Scenario E Policy on jobs growth</p> <p>The number of homes that would be needed to balance a 'policy on' jobs growth target whereby 6,500 additional jobs are created by 2040 through new employment sites at a new garden community and at Stafford Station Gateway in addition to the Cambridge Econometrics (Nov 2018) baseline projection for employment growth.</p>	647 (711)
<p>Scenario F past trends jobs growth</p> <p>The number of homes that would be needed to balance the continuation of past (2000-2018) job trends growth in the borough, again assuming no change to commuting patterns.</p>	683 (746)
<p>Scenario G 50% jobs growth boost</p> <p>The number of homes that would be needed to accommodate jobs growth that is 50% higher than the Cambridge Econometrics (Nov 2018) projection, again assuming no change in commuting patterns.</p>	540 (597)

New Local Plan Preferred Options

Stone settlement strategy

Housing

Stone town will continue to meet housing requirements by providing approximately 881 new market and affordable homes 2020-2040.

New housing development will be provided at a range of development locations as identified on the policies map, and in accordance with Policy 12 Other housing land allocations.

Economy

Employment growth and the promotion of economic diversification will be provided through the completion of existing employment land commitments as detailed in Appendix 7.

Land identified as an employment use will be protected as employment land in accordance with Policy 16 Protection of Employment Land.

Stone town centre will support Stafford Borough over the plan period as a key market town. All new development proposals within Stone town centre should enhance the appeal of the centre and encourage longer visits in accordance with Policy 19 Town Centres and Main Town Centre Uses. A more flexible approach to appropriate uses in the centre would potentially support a more diverse range of activity and encourage the use of vacant units and/or the redevelopment of underutilised buildings.

Design and Infrastructure

Development will be required to prioritise sustainable transport and, where possible, enhance or provide infrastructure for walking, cycling and public transport, in line with Policy 52.

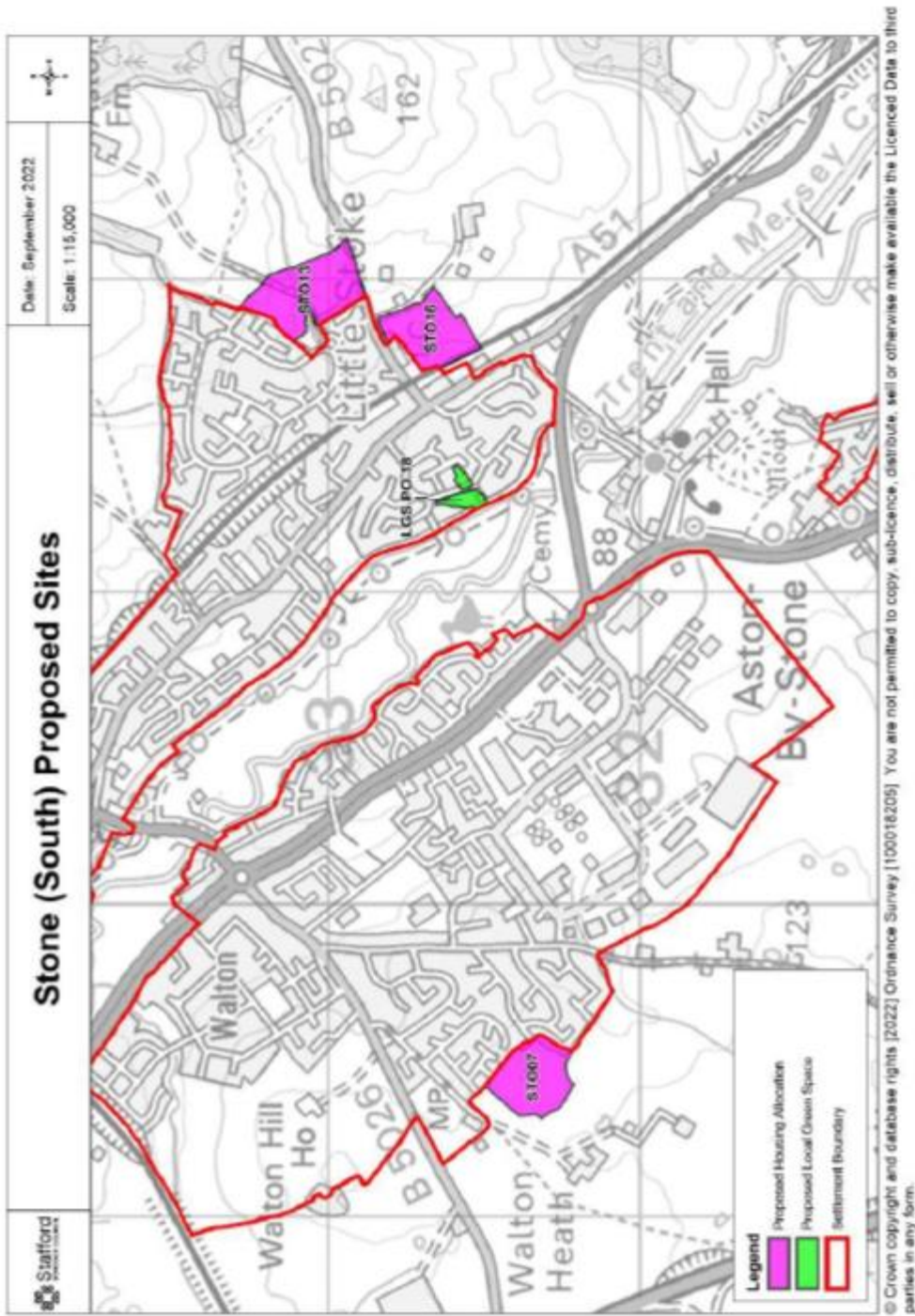
Environment

The historic environment will be preserved and enhanced to help encourage tourism within the borough, together with the Trent & Mersey canal. Stone town's unique character and heritage will be promoted. Any residential development will not damage the integrity of the Cannock Chase Special Area of Conservation (SAC) if within 15 km of this designation, nature conservation interests and Local Nature Reserves. An enhancement area will be delivered within the plan period, as indicated in Policy 15 Stone Countryside Enhancement Area

Policy 12 of the New Local Plan Preferred Options**POLICY 12. Other housing and employment land allocations**

A. The following list of sites, as shown on the policies map, are allocated for housing development:

Site name	Capacity
<i>Stone</i>	
SCC Depot, Newcastle Road (STO05)	18
Land at Marlborough Road (STO07)	101
Land at Trent Road (STO08 and STO10)	20
Land adjacent to Stone Police Station (STO09)	3
Land East of Oakleigh Court (STO13)	131
Land at Uttoxeter Road (STO16)	97



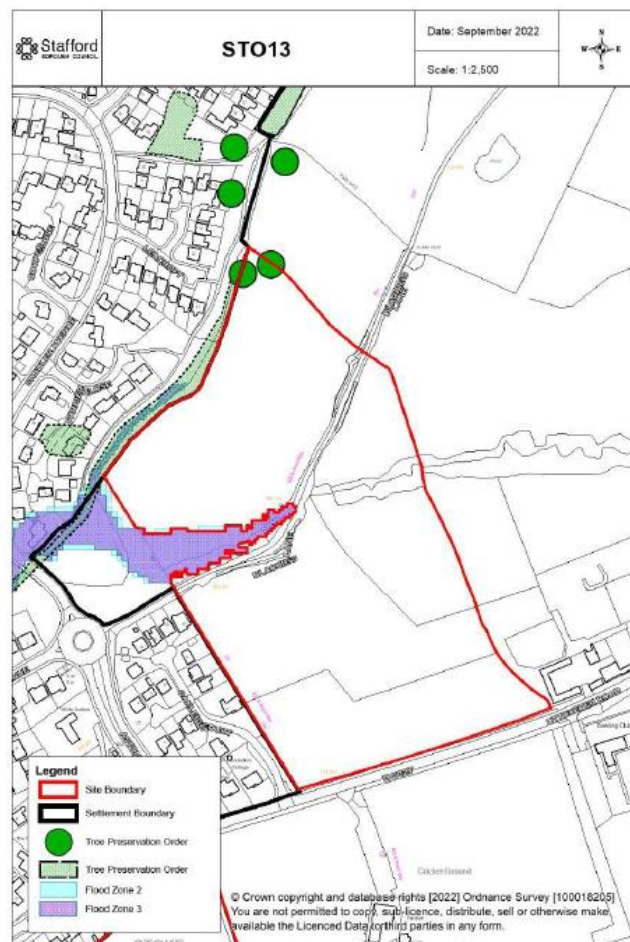
Appendix 1**Site ID:** STO07**Site Name:** Land at Marlborough Road**Settlement:** Stone **Site Area (ha):** 4.79 **Land Use:** Housing**Potential Yield:** 101 dwellings**Essential Site-Specific Requirements:**

- Retain hedgerows and trees.
- Adjacent habitats to the site need full assessment, with any required mitigation as a result.
- Incorporate species rich grassland creation and / or enhancement into any design schemes.
- Create landscape buffer to wider countryside.

Proposed Access: Access from Marlborough Road needs to be checked / confirmed.

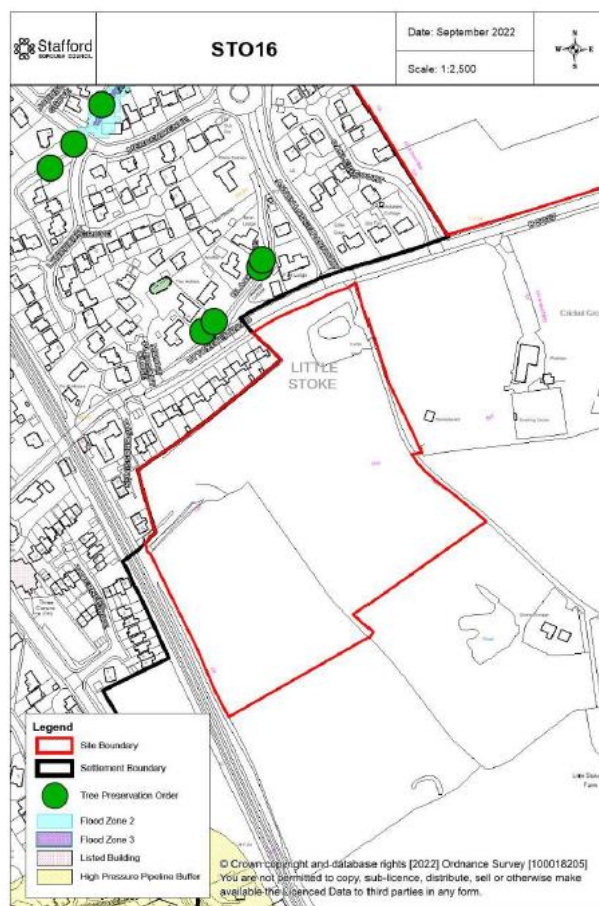
Appendix 2**Site ID:** STO13**Site Name:** Land east of Oakleigh Court**Settlement:** Stone **Site Area (ha):** 6.26 **Land Use:** Housing**Potential Yield:** 131 dwellings**Essential Site-Specific Requirements:**

- Mitigation measures required by Network Rail. These include: ANPR – Red light traffic enforcement cameras, Vehicle activated lights, Yellow box markings on the crossing, Decking (provision of new rail decking)
- Full ecological surveys of the habitats on site should be carried out, along with any required mitigation as a result.
- Retain woodlands and hedgerows.
- Part of the site may be suitable for the implementation of natural flood management (NFM) interventions.
- An attractive frontage landscape should be established to Uttoxeter Road.
- A new, green edge to the settlement should be established along the site's eastern edge.

Proposed Access: Accessible via Uttoxeter Road.

Appendix 3**Site ID:** STO16**Site Name:** Land at Uttoxeter Road**Settlement:** Stone **Site Area (ha):** 4.62 **Land Use:** Housing**Potential Yield:** 97 dwellings**Essential Site-Specific Requirements:**

- Mitigation measures required by Network Rail. These include: ANPR – Red light traffic enforcement cameras, Vehicle activated lights, Yellow box markings on the crossing, Decking (provision of new Strail decking)
- Retain woodlands, in-field trees, hedgerows and areas of scrub or provide scrub as part of any design schemes.
- Ensure that ponds just outside of the site boundary are effectively protected and that no run-off or pollutants are allowed to enter and degrade the habitat or water quality. If possible, seek to enhance habitats.
- Incorporate species rich grassland creation/enhancement into any design schemes.
- A positive frontage should be provided to Uttoxeter Road.

Proposed Access: Accessible from Uttoxeter Road.

COMMENTS ON NEW LOCAL PLAN 2021 -2041 POLICIES

Policy 4 and 17

It is important that local energy generation and efficiency is a consideration in domestic, commercial and urban design and that a target of 0 or negative carbon footprint is incorporated in the design. It has been suggested that all new dwellings and commercial units should have solar panels fitted. There are costs and aesthetic considerations and developers will no doubt disagree but there has been huge opportunity missed in the North Stafford development where hundreds of houses have been built with no domestic generation. Solar panels pay for themselves within 7 years and greatly reduce the call on the national grid.

It is also important that strict requirements for energy efficiency in terms of heat insulation, air circulation, draught exclusion, some of which conflict are applied to any domestic and commercial development.

There is no mention of communal energy generation which for major developments must be considered. There is currently a move away from gas boilers and towards heat pumps. Air sourced heat pumps are the most cost effective solution for individual houses but ground sourced or water sourced are more effective but at greater initial cost but could be appropriate as a shared community asset.

Alongside weather dependent generation, electricity storage is important both individually and communally. This benefits householders and excess generation feeds into the grid. So it may not be necessary to try to enforce inclusion into developments.

Applications to retro fit should be viewed favourably where this does not conflict with other rules such as conservation and heritage. However, there are areas where solar panels can be fitted unobtrusively and these should be viewed favourably.

Policies 23 – 40

There is a move away from petrol and diesel transport towards electric and hydrogen. All developments both single and community should have off-street parking and recharging facilities for EVs. NB. It is not necessary to require fast charging in individual residences but power should be accessible.

For any applications where this is not possible and for larger developments consideration should be given to on street charging through purpose built chargers and alternatives such as lamppost chargers.

Policies 7 8

The design of housing, commerce, the town centre, green space and roads must be carefully designed both for the residents and the surrounding communities.

Specifically consideration must be given for the expected traffic flows, the source and destination of travel and the ingress and egress routes, and the impact on existing routes. It is likely that access to the M6 will be a major requirement and the current junctions are 14 and 15 are not conveniently positioned. A station is planned but if within the new community is unlikely to be convenient for access to Stone and Stoke on Trent. Eccleshall is easily accessible, Stone less so and the impact of a railhead at Yarnfield on access to the A34 and Stone is problematic.

Policies 23 24

It is important that housing standards are applied and enforced on all levels of housing down to first time affordable houses and to ensure that developers do not achieve affordable ratios by reducing living space to reduce area allocated to affordable housing nor by building flats at the edges or normal housing developments.

Policies 1, 6, 13

It is vital to incorporate green space within housing developments to reduce housing density provide leisure and play areas. These must be protected from speculative purchase and infill developments. There was a missed opportunity where green space initially requested within the Stone Neighbourhood plan was rejected and some of these small patches of land have had completely inappropriate planning applications submitted to the detriment of the local community.

Policy 1

All ad hoc applications for new housing must be included in the overall targets for housing provision in the area.

Service provision for larger developments must be enforced to ensure residents do not have to travel unnecessarily for day to day needs. An opportunity was missed in several larger developments where a requirement for local services was allowed to be dropped on the developers' request (I believe) for example Aston Lodge.

Policy 19 24

Accessibility is important for houses, shops, other workplaces, streets and town centres. Consideration for people with mobility issues must be incorporated into the design. These issues include: wheelchair use, vision problems, age related problems, parents with small children.

Policy 43 46

Along with managing green spaces for the benefit of the community, access to clean open water must be facilitated. This means enforcement of regulations stopping pollution of rivers and lakes and canals. This applies mainly to water and sewage companies but also to agriculture and local residents.

From: Robert Hine [REDACTED]
Sent: 12 December 2022 09:59
To: SPP Consultations
Subject: Response to Stafford Borough Local Plan 2020-2040
Attachments: SM Response to Stafford Borough Local Plan 2020 .pdf

Please find attached our response to the Preferred Options document relating to Stafford Borough Local Plan 2020-2040, submitted on behalf of Sustainability Matters.

I would be grateful if you could notify me of receipt.

Thank you

Robert Hine MSc

[SUSTAINABILITY MATTERS in Stafford Borough](#)

[REDACTED]

[REDACTED]

Stafford Borough Local Plan 2020-2040: Preferred options

Response by Sustainability Matters in Stafford Borough



Contact: Robert Hine [REDACTED]

We welcome many aspects of the latest draft of the Local Plan, especially compared with the Issues and Options document published in 2020. There is now a greater emphasis on the need for new development to drastically reduce carbon emissions to net zero in light of the climate crisis, and enhance biodiversity. Moreover, the technologies required to achieve net zero are described in some detail. Our concern is that government policy, such as Building Regulations and the National Policy Planning Framework, is not upgraded sufficiently to match these laudable local ambitions in Stafford Borough, so allowing developers to opt for less sustainable designs.

Key Issues and Challenges

para#5: 'The plan must also reduce lifecycle carbon emissions from new development to contribute to minimising further global heating.'

Response: A stipulation for a Whole Life-Cycle Carbon Assessment for any new development should be explicitly stated. Embodied carbon accounts for a substantial proportion of a building's lifetime carbon emissions, more so as the operational carbon emissions continue to fall with improvements in energy efficiency and low-carbon heating and lighting. The UK Green Building Council projects that embodied carbon could represent 40% of the lifetime carbon emissions of all buildings by 2040. So it is imperative that developers take steps to reduce this significant contribution to global warming. The Plan must incorporate targets to mitigate or offset the carbon cost of construction and demolition of both residential and nonresidential buildings. See <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance>

Policy 1: Development Strategy

1.3 – In addition to the borough's own housing need, the development strategy also allows for 2,000 homes [at Meecebrook] as a contribution to meeting unmet need of other authorities in the region.

Response: Why does Stafford Borough feel compelled to accommodate the unmet housing needs of other authorities? The proposed development at Meecebrook is a greenfield site, and will have a detrimental impact on the local environment. Moreover, it will entail loss of agricultural land, which is a precious resource for food production. Where is the evidence for this 'unmet need'?

1.27 – Stafford town will maintain its role as the commercial centre of the borough. The employment land requirement will be met through redevelopment including the Stafford Station Gateway project, and projects such as the town centre transformation, to maintain an attractive environment and to ensure an efficient use of land.

Response: What exactly is the ‘town centre transformation’ project? This is mentioned just twice in the entire document. Yet, Stafford town centre is in steep decline, with many empty shops and offices. Is this just a vague aspiration?

1.28 – A more flexible approach will be taken to Stafford town centre’s spaces, including the encouragement of development that provides leisure services, and in particular hospitality services, such as cafes and restaurants to meet a demonstratable demand. An increase in the number of people living in the town centre will support a vibrant economy, ensure the efficient use of land and deliver sustainable communities going forward.

Response: How much of the town centre is earmarked for this ‘project’? How will it be delivered, when, and what will the ‘transformation’ involve? There is no detail about timescale for this, with the risk of further decline and dereliction of the town centre while housing on the outskirts proliferates. Without a timely and viable plan for town centre regeneration, Stafford town risks becoming permanently ‘hollowed out’

POLICY 4.

A. All major development should set out how embodied emissions have been taken into consideration through the production of an embodied carbon assessment

Response: This is too vague. As noted, a Whole Life-Cycle Carbon Assessment for any new development should be explicitly required.

We broadly welcome other aspects of Policy 4.

POLICY 7 Meecebrook

Response: It is unclear what arrangements will be made regarding the long-term ownership, management, and maintenance of the site, with regard to who will pay and how standards of maintenance will be regulated.

‘Future Homes Standard’ will come into effect in 2025. The Passivhaus construction has been identified as the preferred construction for Meecebrook. To what extent will this development be able to meet the range of housing needs that are required to meet local need. The potentially phased introduction of ‘Future Homes Standards’ after 2025 may well be highly problematic for Meecebrook if named developers insist on treating the whole development as one unit and all 6,000/10,000 homes are constructed to the standards that pertained when the development started.

The concept of Meecebrook Garden Village is that it is planned around 15-minute neighbourhoods and local settlements: Yarnfield (2k), Eccleshall (3K), Swynnerton (4K), Stone (6K), Stafford (11k). The intention is to design out car use, although how this is to be achieved is not explained, nor is it clear if safe, off-road cycle routes will be constructed or how a better, more frequent and affordable bus service is to be provided. Truly sustainable development would restrict space for private cars while ensuring mobility by walking, cycling, public transport, and access to a local car pool, ideally consisting of electric vehicles.

POLICY 11. Stafford Station Gateway

Response: We have several concerns about this development.

Without greater connectivity, the creation of a satellite community will potentially accelerate decline of the town centre and hinder town centre regeneration.

The proposals make no reference to the impact on existing biodiversity or ecological appraisal of the site.

The fate of the balancing pond and its surroundings is a source of concern.

There are no new easy walking and cycling connections to the town centre.

There is a lack of detail about how features of a “sustainable community” are to be incorporated.

Failure to acknowledge existing businesses on the site.

POLICY 18. Home working and small-scale employment uses

A. Home working, small scale employment and the development and expansion of small businesses in residential and rural areas will generally be supported, subject to compliance with other policies of this plan.

Response: We advocate that at least a proportion of new homes are designed to provide space for a home office/workspace to accommodate home working, with all the advantages this brings.

19.8 – The TCCA identifies a requirement for 13,926 sq. m of comparison retail floorspace over the plan period. The TCCA recommends that three quarters of this need is met in Stafford town centre with the remaining quarter to be met in Stone town centre. New development in these locations will be supported to accommodate this.

Response: Really? This Town Centre Capacity Assessment (TCCA) was published in 2019, and prepared leading up to that date. Since then we have had a Covid epidemic, an acceleration in online retail, and are currently in a recession. We question whether Stafford and Stone town centres need all this ‘comparison’ retail floorspace. The evidence of existing empty shops suggests otherwise.

POLICY 20. Agricultural and forestry development

Response: There is no mention in the document of rewilding, whereby some farmland is allowed to revert to a more natural, albeit managed state. This is increasingly regarded as a crucial means of enhancing biodiversity, and a key element in sustainable land management. However, such schemes can face objection from some people, who want a neat and tidy landscape, which is not conducive to biodiversity. Omission of this is regrettable in what should be a forward-looking plan.

20.4 – In cases where polytunnels require planning permission and do not fall within permitted development rights, they will be supported provided that they are located near to the main farm,

are acceptable in terms of their landscape impact and impacts on nearby residential properties and are otherwise in accordance with the policies of this plan.

Response: Vast swathes of farmland in the Borough are already covered in polytunnels, with detrimental implications for biodiversity and flooding, apart from their visual impact. Is there no limit to their expansion? It is now accepted following recent court decisions that polytunnel or polyhouse proposals of significant size, having a substantial degree of permanence and physical attachment to the ground constitute development that requires planning permission.

Note that such development can conflict with policy 44.C.3: *Proposals ...should protect, avoid detrimental effects on and, where appropriate, enhance: The locally distinctive pattern of landscape elements such as woodland, streams, hedgerows, trees and field boundaries.*

POLICY 34. Urban design general principles:

8. Be compact and have streets designed in accordance with Manual for Streets to make walking (including wheelchair, disability scooter and pushchairs) and cycling the easiest way to make short, local journeys and to ensure vehicular parking does not dominate street scenes

Response: There is an underlying assumption that each dwelling requires vehicular parking. Truly sustainable development would challenge that assumption, by restricting space for private cars while ensuring mobility by walking, cycling, public transport, and access to a local car pool, ideally consisting of electric vehicles.

POLICY 35. Architectural design

Response: There should be a requirement for home office/workspace in at least a proportion of new homes at the design stage.

The Plan envisages large-scale adoption of solar PV for new housing development. The developer therefore has a duty to inform householders about care and maintenance of solar PV systems, their usage, life expectancy (c. 25 years) and eventual replacement.

6 Create a healthy, comfortable and safe internal and external environment

Response: Land should be set aside in new developments wherever possible for growing food on easily accessible community gardens or allotments.

POLICY 47. Biodiversity

Response: Again, there is no mention of rewilding as an option for converting existing farmland to deliver enhanced biodiversity.

POLICY 53. Parking standards

A. Car and bicycle parking shall be provided in accordance with the standards set out in Appendix 4.

Response: These standards allow up to 3 parking spaces for a four-bed house. This is not compatible with the aspirations for sustainable developments outlined elsewhere in the Plan. There is evidence that car ownership is declining in the UK. New developments should wherever possible have

restricted parking for cars, where alternatives are feasible and accessible. This frees space for amenity areas, wildlife habitats, and allotments or community gardens. Cars can be made available from community car clubs (see <https://www.co-wheels.org.uk/oxford>).

From: Preferred Options Consultation [REDACTED]
Sent: 11 December 2022 18:09
To: Strategic Planning Consultations
Subject: Preferred Options Consultation - Submitted Response

Full name: **Lucy Davies**

Email: [REDACTED]

Statutory Bodies and Stakeholders

Organisation or Company: **Swynnerton Parish Council**

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? To deliver sustainable economic and housing growth to provide income and jobs., To deliver infrastructure led growth supported by accessible services and facilities. and To provide an attractive place to live and work and support strong communities that promote health and wellbeing.

Development Strategy and Climate Change

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

Policy 1 (Development Strategy): **Yes**

Comments: **The parish Council acknowledges that the Meecebrook settlement would prevent future development in and around rural villages. However, it is vital that adequate infrastructure bring in place as the development progresses to alleviate pressure on surrounding villages whose infrastructure and facilities are already stretched.**

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

Comments: **Within tier 4 & 5 consideration must be given to the adequacy of infrastructure and facilities in place in these areas to ensure that developments in all tiers set out in the Plan will not have an adverse effect on roads, water supply and waste water, internet and limited spaces within school and surgeries.**

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

Comments: **Any development within the countryside should be strongly discouraged**

expect in circumstances where it is unavoidable and/or absolutely necessary.

Policy 4 (Climate change and development requirements): **Yes**

Comments: **110 litres of water per person per day seems rather excessive - recommend this is revised to 50 litres per day per person.**

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

Comments: **The Green Belt should be protected at all costs. Unless absolutely necessary all development is to be restricted.**

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

Comments: **Neighbourhood plans that have already been submitted will need to be updated to reflect the policies with the Plan. Will Parish Councils be required to reconsult with the Parish/residents on the updated plans.**

Meecebrook Garden Community

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

Comments: **Whilst Swynnerton Parish Council would prefer for the settlement not to be located in close proximity to Swynnerton Parish due to the disruption and additional pressures on infrastructure and facilities within the Parish as the site is developed, should the development (as set out in the Plan) be adopted then the key concerns would be the timing and scale of infrastructure for the site. When developing the plan for the site, the sequence of building houses, facilities (shops, schools, surgery), employment and infrastructure should take into account the already stretched infrastructure and facilities with the surrounding villages. The effect on local roads will require careful consideration and should be addressed at the outset of the development. The settlement should be designed as to discourage car movements outside of the Community. In addition, input from and consultation with surrounding Parish Council should form an ongoing part of the plan and development to ensure the impact on surrounding communities is mitigated as far as is practicable.**

Site Allocation Policies

Q4 - Do you agree with the proposed allocations?

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

Comments: **Housing provision for an ageing population remains a challenge in the Plan as developers are reluctant to build bungalows.**

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

Comments: **Housing provision for an ageing population remains a challenge in the Plan as developers are reluctant to build bungalows.**

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

Comments: **To encourage residents to work within Stafford (or commute using the rail system), the number of car parking spaces allocated to new residential buildings should be**

limited. This will also reduce the impact on traffic around the city centre.

Policy 12 (Other housing and employment land): **Yes**

Comments: **No reply**

Site Allocation Policies (continued)

Q5 - Do you agree with the proposed allocations?

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

Comments: **Swynnerton Parish Council would request that the policy be extended to include the creation of new protected green spaces within existing residential areas and villages and a commitment from the Borough Council to provide more play and sporting facilities in rural areas and villages.**

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: **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? **Yes**

Comments: **Provision should be made for adequate shops and facilities to be included within the plan for the Meecebrook Garden Settlement. The developments already approved for Trentham Gardens would be supported.**

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: **Sites outside of the 2 mentioned within the Plan should not be approved, no further sites should be considered for rural areas.**

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: **Swynnerton Parish Council considers that: - Policy 37 is vital for the development of the Meecebrook Garden Community - Policy 38 is essential for all new and existing buildings - both residential and business.**

Environment Policies

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

Comments: **No reply**

Connections

Q13 - Do you agree with policies? **Yes**

Comments: **There is no mention within the Plan of publicly available charging points (or successor technology) for vehicles.**

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: **No reply**

General Comments:

These responses are submitted on behalf of Swynnerton Parish Council

From: Melanie Lindsley [REDACTED]
Sent: 09 December 2022 14:45
To: Strategic Planning
Subject: Stafford Borough Local Plan 2020-2040: Preferred Options
Attachments: Stafford Preferred-Options-Consultation-Response-Form.docx

Dear Sir/Madam

Thank you for your notification received on the 19th October 2022 in respect of the current Local Plan Preferred Options consultation.

Please find attached the comments of the Coal Authority on the completed response form.

Kind regards

Melanie

 The Coal Authority

Melanie Lindsley *BA(Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI*
Development Team Leader (Planning)

M: [REDACTED]
E: [REDACTED]
W : [gov.uk/government/organisations/the-coal-authority](https://www.gov.uk/government/organisations/the-coal-authority)

Resolving the impacts of mining. Like us on [Facebook](#) or follow us on [Twitter](#) and [LinkedIn](#).

Contact Details

Full name (required):

Email (required):

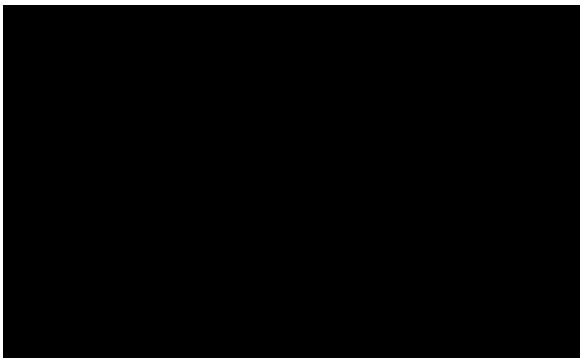
Tick the box that is relevant to you (required):

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

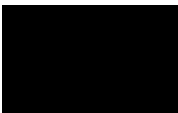
Organisation or Company Name (if applicable): The Coal Authority

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 / No

Policy 1 Comments:

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

Yes / No

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?

Yes / No

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 / No

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:

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:

Policy 50. Pollution

The Coal Authority is a non-departmental public body sponsored by the Department of Business, Energy & Industrial Strategy. As a statutory consultee, The Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

Our records indicate that within the Stafford Borough area there are recorded coal mining features present at surface and shallow depth including; mine entries, fissures and reported surface hazards. These features pose a potential risk to surface stability and public safety.

We provide the LPA with downloadable GIS data in respect of Development Risk Plans. We would expect site allocations for new development to be assessed against this data in order to ensure that any constraints, due to past coal mining activity, which may impact on the quantum of development a site can accommodate are established at an early stage in the process.

It is noted that although Stafford does not have a significant amount of coal mining legacy features the areas where features are recorded as being present are to the north and south eastern corner of the Borough.

The Coal Authority are pleased to see that Policy 50 as drafted does include reference to land instability as a consideration in respect of development proposals. We support this policy. As you will be aware any formal planning application for development within the defined Development High Risk Area, which does not fall on our published exemptions list, should be supported by a Coal Mining Risk Assessment.

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.

From: Preferred Options Consultation [REDACTED]
Sent: 07 December 2022 15:23
To: Strategic Planning Consultations
Subject: Preferred Options Consultation - Submitted Response

Full name: **Tom Clarke MRTPI**

Email: [REDACTED]

Statutory Bodies and Stakeholders

Organisation or Company: **Theatres Trust**

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

Added to database: [REDACTED]

Topics (Contents page): **Design and Infrastructure Policies**

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: **Not asked**

Comments: **Not asked**

Site Allocation Policies

Q4 - Do you agree with the proposed allocations?

Policy 9 (North of Stafford): **Not asked**

Comments: **Not asked**

Policy 10 (West of Stafford): **Not asked**

Comments: **Not asked**

Policy 11 (Stafford Station Gateway): **Not asked**

Comments: **Not asked**

Policy 12 (Other housing and employment land): **Not asked**

Comments: **Not asked**

Site Allocation Policies (continued)

Q5 - Do you agree with the proposed allocations?

Policy 13 (Local Green Space): **Not asked**

Comments: **Not asked**

Policy 14 (Penk and Sow): **Not asked**

Comments: **Not asked**

Policy 15 (Stone Countryside): **Not asked**

Comments: **Not asked**

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: **Not asked**

Comments: Not asked

Q7 - The Stafford Borough Plan proposes policies around the town centres uses, agriculture and

forestry development, tourism development and canals. Do you agree? **Not asked**

Comments: **Not asked**

Housing Policies

Q8 - The local plan proposed a policy (23) on affordable housing. Do you agree? **Not asked**

Comments: **Not asked**

Q9 - The local plan proposes a policy (30) to help meet identified local need for pitches for Gypsies and Travellers. Do you agree? **Not asked**

Comments: **Not asked**

Q10 - The local plan proposes policies around homes for life, rural exception sites, new rural dwellings, replacement dwellings, extension etc. Do you agree? **Not asked**

Comments: **Not asked**

Design and Infrastructure Policies

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

Comments: **Policy 39 - We welcome this policy and its clear statement in presumption of retaining and protecting existing and valued facilities. To further improve robustness and effectiveness we recommend minor amendment of paragraph 39.1 to refer to 'cultural facilities and buildings'. This will make it explicit that the policy applies to the borough's arts and cultural facilities such as its theatres, music venues and museums. We also suggest inclusion of guidance within the supporting text to provide examples of what might constitute sufficient research and consultation. This might include a combination of: 1. Marketing over an extended period (we recommend 18-24 months) through relevant local and national agencies at a value appropriate to existing use and condition without development potential. 2. Evidence the site or facility cannot be utilised for alternative community/cultural/social use. 3. Evidence the site or facility cannot be viable through alternative management arrangements, for example community or voluntary ownership/operation.**

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:

No reply

From: David Croxford [REDACTED]
Sent: 08 December 2022 15:14
To: Strategic Planning; planning SBC
Cc: [REDACTED]
Subject: Stafford Borough Local Plan 2020-2040 - Response from the Trent Valley Collaboration Group of Parishes.
Attachments: 20221208 Response to Stafford Borough local plan consultation (1).pdf

Good afternoon

The Trent Valley Collaboration Group (TVCG) comprises Clerks and Councillors representing the Parish Council areas of Brocton; Colwich, Weston-with-Gayton; Hixon; Stowe-by-Chartley; Berkswich; Tixall with Ingestre; Salt-with-Enson, Berkswich, Sandon & Burston and Hopton & Coton.

TVCG members welcome the opportunity to comment on the latest stages of Stafford Borough Council's Local Plan Review consultation process.

Our detailed response is attached.

Please acknowledge receipt.

--

Kind regards

David Croxford

Clerk to Weston with Gayton Parish Council

Tel: [REDACTED]
Email: [REDACTED]

[REDACTED]

[REDACTED]

The Trent Valley Collaboration Group (TVCG) comprises Clerks and Councillors representing the Parish Council areas of Brocton; Colwich, Weston-with-Gayton; Hixon; Stowe-by-Chartley; Berkswich; Tixall with Ingestre; Salt-with-Enson, Berkswich, Sandon & Burston and Hopton & Coton.

TVCG members welcome the opportunity to comment on the latest stages of Stafford Borough Council's Local Plan Review consultation process.

TVCG members have considered the proposed Settlement hierarchy as set out on page 34 of the preferred options booklet. The group notes that much of the TVCG area is allocated to Tiers 4 and 5, meaning there are no significant proposed housing development sites.

The future success, or otherwise, of the Local Plan Review in terms of housing allocations sites, is largely dependent on the delivery of the Meecebrook Community Garden Village, where 3,000 housing units are proposed. However, the absence of any 'Plan B' (should the Meecebrook development fall short of its projected targets) is a matter of concern. A detailed time-line and schedule of development would be welcome if the Local Plan Preferred Options proposals are adopted.

Unlike previous Local Plan reviews, there does not appear to be any proposals to build relatively large housing developments in what were known as Key Service Villages (KSVs). KSVs like Great Haywood and Hixon have accommodated significant new house building sites without there being any commensurate improvement in local amenities, facilities or public transport. For these reasons, the proposal in the latest Local Plan Review are welcome.

For similar reasons it is also welcome that the existing Recognised Industrial Estate Boundaries are not proposed to be extended in the TVCG area.

Moving away from the housing and industrial development proposals in the Local Plan Review, it noted that a large area of open countryside to the south west of Weston is annotated as "Potential Renewable Energy" site. The area is on a highly exposed site sloping down to the river Trent and further details would be welcome.

Notwithstanding these fairly parochial observations about the TVCG area, there are many other issues within the consultation documents on which the TVCG wishes to comment:

Policy 4: Climate Change Development Requirements;

Comment: TVCG welcomes proposals that ensure new housing properties are built to the highest insulation standards and moving away from on-site fossil fuel consumption. In addition, to a requirement for all newbuilds to have the highest insulation standards there should be a requirement for newbuilds to be fitted with solar panels as standard where appropriate. Policy 4 is supported.

Policy 5: Green Belt;

Comment: TVCG welcomes the confirmation that the adjacent North Staffordshire Green Belt and West Midlands Green Belt will not be altered in the Local Plan Review. Furthermore, in order to preserve green belt areas, greater emphasis and pressure should be placed on utilising brown field sites. These are not popular with developers but there are many disused sites and buildings both within the urban town areas and outside which could be utilised for housing. Policy 5 is supported.

Policy 6: Neighbourhood Plans;

Comment: TVCG is concerned that previously adopted and emerging Neighbourhood Plans may have diminished powers to influence local developments in the future. Further information required.

Policy 18: Home working and small scale employment uses;

Comment: TVCG welcomes small scale offices of less than 100m², subject to location within the development boundary and design.

Policy 19: Town Centres;

Comment: TVCG supports, subject to further details about how the £14.4m Government grant and matched funding will be utilised, proposals that will revitalise the high street. In particular the area between Market Square and Gaol Square in Stafford.

Policy 20: Agriculture and Forestry;

Comment: TVCG welcomes proposals that encourage local food growing to reduce food miles, subject to appraisal of the implications on local infrastructure.

Policy 21: Tourism;

Comment: TVCG welcomes more encouragement for people to visit the areas subject to adequate provision of parking facilities and/or improved public transport services.

Policy 22: Canals;

Comment: TVCG supports the protection of canals and towpaths.

Policy 23: Affordable Housing;

Comment: TVCG supports the proposals for the percentage of affordable housing as set out. However, a commitment to affordable housing alone needs to be expanded to the type and size of houses. Large luxury homes are popular with developers as they bring in the money. However, the housing shortage is amongst first time buyers and housing developments should contain a much higher proportion of smaller properties that are inevitably much more affordable but would not strictly fall within the tight definition of 'affordable housing'. The Group requests further details how the proposals impact on S106 developer contribution agreements

Policy 30: Gypsy and Traveller Accommodation

Weston with Gayton Parish Council requests the proposed site for 'at least' ten pitches adjacent to the A518 near Gayton is deleted from the preferred options. The Parish Council contest the site does not meet the criteria of Policy 30 Point B 1,2,3,4, and 5.

Policy 41: Historic Environment;

Comment: TVCG supports proposals that preserve and where appropriate enhance the significance of heritage assets.

Policy 43: Sustainable Drainage;

Comment: TVCG supports proposals to incorporate Sustainable Drainage Systems (SuDS) subject to location and capacity reassurance.

Policy 45: Cannock Chase Area of Outstanding Natural Beauty (AONB);

Comment: TVCG supports the conserving and enhancing the landscape of the Cannock Chase AONB.

Policy 49: Trees;

Comment: TVCG supports encourages the planting of new trees and the protection of existing trees. The Group would like 'tree-lined' streets to be integral to the design of new housing developments.

Policy 52: Transport;

Comment: TVCG supports proposals that minimise the use of private cars by placing developments near existing amenities and facilities and public transport. Alternatively, incorporate new amenities and facilities into the developments and/or extend public transport provision.

Policy 53: Parking and Electric Vehicle Charging Points Standards.

Comment: TVCG supports Policy 53 proposals.

From: David Croxford [REDACTED]
Sent: 12 December 2022 09:59
To: Strategic Planning Consultations; planning SBC
Cc: [REDACTED]
Subject: Stafford Borough Local Plan 2020-2040 - Response from Weston with Gayton Parish Council
Attachments: Weston with Gayton PC response to Stafford Borough local plan consultation.pdf

Good morning

Weston with Gayton Parish Council wishes to confirm complete support of the earlier submission from the TVCG and in addition wishes to submit a further footnote in respect of Weston ST18.

Our submission on behalf of Weston with Gayton Parish Council is attached.

Please acknowledge receipt.

Thank you

--

Kind regards

David Croxford

Clerk to Weston with Gayton Parish Council

Tel: [REDACTED]

Email: [REDACTED]

[REDACTED]

[REDACTED]

Weston with Gayton Parish Council wishes to confirm complete support of the below from the TVCG and in addition wishes to submit a further footnote in respect of Weston ST18.

The Trent Valley Collaboration Group (TVCG) comprises Clerks and Councillors representing the Parish Council areas of Brocton; Colwich, Weston-with-Gayton; Hixon; Stowe-by-Chartley; Berkswich; Tixall with Ingestre; Salt-with-Enson, Berkswich, Sandon & Burston and Hopton & Coton.

TVCG members welcome the opportunity to comment on the latest stages of Stafford Borough Council's Local Plan Review consultation process.

TVCG members have considered the proposed Settlement hierarchy as set out on page 34 of the preferred options booklet. The group notes that much of the TVCG area is allocated to Tiers 4 and 5, meaning there are no significant proposed housing development sites.

The future success, or otherwise, of the Local Plan Review in terms of housing allocations sites, is largely dependent on the delivery of the Meecebrook Community Garden Village, where 3,000 housing units are proposed. However, the absence of any 'Plan B' (should the Meecebrook development fall short of its projected targets) is a matter of concern. A detailed time-line and schedule of development would be welcome if the Local Plan Preferred Options proposals are adopted.

Unlike previous Local Plan reviews, there does not appear to be any proposals to build relatively large housing developments in what were known as Key Service Villages (KSVs). KSVs like Great Haywood and Hixon have accommodated significant new house building sites without there being any commensurate improvement in local amenities, facilities or public transport. For these reasons, the proposal in the latest Local Plan Review are welcome.

For similar reasons it is also welcome that the existing Recognised Industrial Estate Boundaries are not proposed to be extended in the TVCG area.

Moving away from the housing and industrial development proposals in the Local Plan Review, it noted that a large area of open countryside to the south west of Weston is annotated as "Potential Renewable Energy" site. The area is on a highly exposed site sloping down to the river Trent and further details would be welcome.

Notwithstanding these fairly parochial observations about the TVCG area, there are many other issues within the consultation documents on which the TVCG wishes to comment:

Policy 4: Climate Change Development Requirements;

Comment: TVCG welcomes proposals that ensure new housing properties are built to the highest insulation standards and moving away from on-site fossil fuel consumption. In addition, to a requirement for all newbuilds to have the highest

insulation standards there should be a requirement for newbuilds to be fitted with solar panels as standard where appropriate. Policy 4 is supported.

Policy 5: Green Belt;

Comment: TVCG welcomes the confirmation that the adjacent North Staffordshire Green Belt and West Midlands Green Belt will not be altered in the Local Plan Review. Furthermore, in order to preserve green belt areas, greater emphasis and pressure should be placed on utilising brown field sites. These are not popular with developers but there are many disused sites and buildings both within the urban town areas and outside which could be utilised for housing. Policy 5 is supported.

Policy 6: Neighbourhood Plans;

Comment: TVCG is concerned that previously adopted and emerging Neighbourhood Plans may have diminished powers to influence local developments in the future. Further information required.

Policy 18: Home working and small scale employment uses;

Comment: TVCG welcomes small scale offices of less than 100m², subject to location within the development boundary and design.

Policy 19: Town Centres;

Comment: TVCG supports, subject to further details about how the £14.4m Government grant and matched funding will be utilised, proposals that will revitalise the high street. In particular the area between Market Square and Gaol Square in Stafford.

Policy 20: Agriculture and Forestry;

Comment: TVCG welcomes proposals that encourage local food growing to reduce food miles, subject to appraisal of the implications on local infrastructure.

Policy 21: Tourism;

Comment: TVCG welcomes more encouragement for people to visit the areas subject to adequate provision of parking facilities and/or improved public transport services.

Policy 22: Canals;

Comment: TVCG supports the protection of canals and towpaths.

Policy 23: Affordable Housing;

Comment: TVCG supports the proposals for the percentage of affordable housing as set out. However, a commitment to affordable housing alone needs to be expanded to the type and size of houses. Large luxury homes are popular with developers as they bring in the money. However, the housing shortage is amongst first time buyers

and housing developments should contain a much higher proportion of smaller properties that are inevitably much more affordable but would not strictly fall within the tight definition of 'affordable housing'. The Group requests further details how the proposals impact on S106 developer contribution agreements

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Policy 53: Parking and Electric Vehicle Charging Points Standards.

Comment: TVCG supports Policy 53 proposals.

Additional Footnote- Weston, ST18

Weston is aware that the proposed Local Plan makes no direct impact reference to the village of Weston, however we would like to have it noted that, in the context of the future, we seek to preserve the view / outlook from a long-standing community asset – Weston Village Green.

Weston Village Green(s) (3 sections across the middle of the village) was granted to the Parish Council under covenant and is to be used for the well-being and social interest of the local community. The Parish is committed to ensuring that this space is used in ways that meet the priorities and needs of the local community. Weston Village Green(s) are managed and maintained by Weston & Gayton Parish Council.

We are conscious of an area of farmland to the Northeast of the Village (Green Road / A51 junction end / on the side rear of the Saltworks Lane housing development, running to the A51, which has previously had a 'pre-planning application' rejected (some years ago); Our purpose in submitting this footnote is to ensure that this area of farmland, which provides green space views from the village green, is preserved out in the future, as a green space / view (e.g.) does not become earmarked for local housing / amenity development, in which case the green space outlook for the village will be lost.

See photographs below

Pic 1 – View of farmland in question from the Northeast end of Weston Village Green



Pic 2 – View of the farmland stretch (Saltworks Lane development on the right / A51 to the left).




From: [REDACTED]
Sent: 12 December 2022 09:37
To: SPP Consultations
Subject: Yarnfield and Cold Meece Parish Council Consultation Response - SBC Local Plan
2020-2040 Preferred Options
Attachments: Consultation Response (Final).pdf

Dear [REDACTED]

Please find attached the parish council's response to the Local Plan 2020-2040 Preferred Options.

John Fraser
Parish Clerk
Yarnfield and Cold Meece Parish Council
www.ycm-pc.org.uk

 @ycmparishcouncil



Yarnfield and Cold Meece Parish Council

Stafford Borough Council Preferred Options Consultation Response

1. Meecebrook Garden Community

1. Introduction

- 1.1 Yarnfield and Cold Meece Parish Council acknowledges Stafford Borough Council's preferred option of Meecebrook Garden Community to address the local housing need over the next 20+ years. We welcome this opportunity to comment, but request in the strongest possible terms that our parish, with Chebsey and Eccleshall, is actively engaged in the refinement of future plans.
- 1.2 The councillors understand that Meecebrook has emerged as the preferred site largely due to the opportunities for scale and ambition it represents.
- 1.3 We accept the need for new housing in the Borough and we understand that the duty to cooperate requires the Borough Council to consider unmet need for housing within the region as well as locally.
- 1.4 We recognise the desire to create capacity within the workforce to support economic growth.
- 1.5 We would like to see high quality new housing built in Stafford Borough with careful consideration given to connectivity, community, employment, education, health and wellbeing for new residents and existing communities.
- 1.6 However, having studied the Preferred Options paper and associated evidence we believe that Meecebrook appears to be at best an unrealistic aspiration and at worst a costly social experiment which is highly likely to fail. The impacts of this will be felt most keenly by the residents of Meecebrook and the three parish councils but the financial burden will be borne by the residents of the whole of the Borough.

2. Timing of the Consultation

- 2.1 Meaningful assessment and analysis is difficult as this consultation is happening ahead of the publication of the Meecebrook Masterplan. Appendix 9 of the Local Plan is frustratingly blank, and we only have a concept map to consider.
- 2.2 Since the devil will be in the detail, our comments are by necessity limited to points of principle and will often be presented as questions.
- 2.3 We would like to have raised many of these comments and questions over the past 3 years, which would have given Stafford Borough Council the benefit of accommodating local knowledge and expertise within the published plans.

3. Fundamental assumption that one large new development is best
 - 3.1 **The focus on the creation of a garden community, at the expense of housing development in existing settlements, threatens the growth and sustainability of rural communities.**
 - 3.2 **Careful consideration needs to be given to the cost of infrastructure associated with large scale development and the unintended consequences of delayed provision of major infrastructure projects.**
 - 3.3 **There is a fear that Meecebrook would become a “black hole” drawing in all future investment at the expense of existing settlements.**
 - 3.4 There is a perceived perception within the Preferred Options that development in existing settlements is bad; that it will be opposed by residents and will undermine the quality of those settlements. Yarnfield has seen a 55% increase in the number of houses during the life of the existing local plan. These developments have enhanced and added to the diversity of the parish, resulting in a shift in the age profile of the parish without which Yarnfield would have become an increasingly elderly population with little or no future for the community.
 - 3.5 Developments within rural settlements, supported by neighbourhood plans, will provide for renewal of housing stock and an opportunity for upgrading and improving local infrastructure and facilities across the whole of the borough. Without the s106 monies that currently support local communities, how does Stafford Borough Council propose to fund community infrastructure improvements?
 - 3.6 We can find no evidence in the Preferred Options that demonstrates how, and at what cost, development sites in the existing settlements might be supported nor evidence to show that such developments would support improvements to local infrastructure projects. There is a fear that Meecebrook would become a “black hole,” drawing in all future investment at the expense of existing settlements.
4. Fundamental re-evaluation of the Sustainability Proposal
 - 4.1 **We believe the Meecebrook proposals are fundamentally flawed, and the review of the Sustainability Appraisal fails to take account of the withdrawal of the MOD Swynnerton site.**
 - 4.2 The Meecebrook Garden Community Concept documents states that “The concept of locating a new settlement at Cold Meece is not a new one and has been mentioned since munition production at MOD Swynnerton ceased after WW2. The concept for this new settlement was revisited in 2015, gaining further momentum when it was included in the HS2 inspired Constellation Partnership Growth Strategy which was submitted to Government in early 2017”
 - 4.3 The scheme has been developed over a number of years, with a great deal of money spent on staff time, consultants and other spending, yet there still seems to be no evidence presented to demonstrate that the new town is viable, or deliverable as proposed.
5. Housing Numbers
 - 5.1 **We believe the proposed housing numbers are not justified and unnecessary to meet the future housing needs of the Borough.**
 - 5.2 **Stafford Borough Council needs to demonstrate the additional housing numbers are supported by requests from neighbouring local authorities.**
 - 5.3 **We believe the Preferred Options does not account for the true level of windfall homes that will come forward during the plan period.**

- 5.4 **We do not consider that Meecebrook can be justified by the need to deliver additional housing and employment land in the Borough.**
- 5.5 The minimum figure for local housing need set by national guidance (calculated in accordance with the standard methodology outlined in the Planning Practice Guidance) of 391 new homes per year would produce a requirement for 7,820 dwellings over the life of the plan.
- 5.6 The Stafford Borough Economic and Housing Development Needs Assessment (Lichfields 2020) proposes that, to supply the workforce to support the core employment growth forecast, the borough's housing need equates to 435 new dwellings each year which would produce a requirement for 8,700 dwellings over the life of the plan.
- 5.7 The addition of a further 2,000 dwellings to provide for migration has been done to justify the development of Meecebrook and is unsupported by evidence of need or requests from other local authorities.
- 5.8 The Black Country Consortium who supported the principle of Stafford Borough Council providing housing to support need for the Consortium was made in 2020. However, the Sustainability Appraisal of the Black Country Plan: Regulation 18 SA Report, July 2021 makes no reference to Stafford; "The neighbouring authorities which would be likely to take some of the housing and employment need for the BCP are: South Staffordshire; Shropshire, Solihull, Lichfield; and Cannock. Further exporting to Telford and Wyre Forest is also being considered." para - 1.4.3
- 5.9 The Preferred Options proposal is based on only 6% of housing being provided through windfall sites, accounting for only 750 windfall homes. The Borough Council routinely monitor housing completions and from this it is clear the average of 400+ dwellings per year were built on windfall sites.
- 5.10 Supporting the development of windfall sites will give greater weight to the benefits of using appropriate sites within existing settlements and is so doing support the viability of those settlements.

6. Affordable Housing

- 6.1 **Meecebrook lies in two parish council areas, Eccleshall and Chebsey. Planning Policy 23 sets different affordable housing quotas for these parishes which will lead to inconsistency across the proposed development.**
- 6.2 **Policy 23 should be amended to require a 40% affordable housing quota across the whole of the Meecebrook development.**
- 6.3 **The Master Plan should ensure that affordable housing provision within the site should be fully integrated within the overall housing plan and not marginalised to specific areas and should be phased to occur alongside the general housing development.**
- 6.4 Policy 23 defines the approach of Stafford Borough Council to affordable housing and this policy appears to be sensitively and sensibly written. Has a decision been made about the location and composition of affordable housing as the requirements are very different regarding greenfield sites in Chebsey and Eccleshall?

7. Garden Community – Infrastructure Fund

- 7.1 **Will the reduced scale of development prevent the Meecebrook Development Board securing national infrastructure funding?**
- 7.2 We note the change in name for Meecebrook from "Garden Village" to "Garden Community." This we assume is needed because of the reduction in scale of the

proposal following the withdrawal of the MOD site at Cold Meece. The Garden Community concept was to see 10,000+ houses developed. This however has now been downgraded to 3,000 houses in the plan period and a possible further 3,000 in the future.

- 7.3 This scale of development will inevitably bring reduced opportunities for capital investment required to deliver the infrastructure proposals to create a complete self-sufficient, off-grid, community.

8. Unintended consequences

- 8.1 **No account appears to have been taken for the impact on surrounding settlements arising from housing developments coming before essential infrastructure: schools, roads, transport links and health services.**

8.2 We are concerned that we have not seen an assessment of the impact of Meecebrook on surrounding communities. The AECOM SA provides insight into the impact on biodiversity, land and flooding but the scope of the brief is limited, and the focus is more on opportunity than mitigation.

8.3 Some of the unintended consequences will occur as a result of the phasing of the development, where dwellings are occupied long before the infrastructure designed to support the communities and others will undoubtedly centre around unplanned cost rises.

8.4 The infrastructure to support the community is unlikely to be financially viable until the population reaches a certain point, meaning that the people who move into homes in the early phases of development will establish lifestyles dependent on car travel. Those residents who embrace the environmentally friendly car-free ambition may find themselves isolated. A cohesive and self-sufficient, sustainable community would need to be enabled from the outset, rather than retrofitted once private businesses calculate they will get a reasonable return on their investment.

8.5 We know from experience that it is difficult to bring people together in a diverse community without facilities and activities that give them motivation and opportunity to mix.

8.6 Other unintended consequences will arise because of unanticipated cost increases leading to compromises having to be made and spending prioritised on whatever is deemed to be most essential and/or cost effective. This scenario would undoubtedly undermine the concept and viability of the garden community.

9. Mitigating or responding to unintended consequences.

- 9.1 **We are concerned that consultants' reports have a tendency to tell the client what they want to hear, particularly when further commissioned work is anticipated, and when they do highlight risks, these can be overlooked.**

9.2 Overly optimistic predictions and best case scenario calculations are likely to mean that insufficient funds are available to mitigate unintended consequences. Worse still, responsibility for aftercare (of residents' wellbeing, community cohesion, buildings, services, roads, pavements, cycle ways, water courses, natural spaces etc) can easily be dodged and those who might have been accountable are long-gone once problems are evident.

10. Over-promising

- 10.1 **We are concerned that the Meecebrook Vision is founded on a promise to provide services and community facilities that rely entirely on others to deliver.**

- 10.2 We are concerned that it is not within the gift of Stafford Borough Council to promise a railway connection, schools or healthcare provision. However, it is these very advantages that have caught the imagination of the media (through targeted briefing) and local people.
11. Healthcare
- 11.1 **We are concerned that in section L of Policy 7 healthcare provision is excluded from the list of amenities which must have guaranteed funding before development can commence.**
- 11.2 There is a national shortage of primary care professionals - GPs, practice nurses, dentists, community pharmacists etc. The national shortage of residential and domiciliary care is at a critical level. The shortfall is not due to a lack of premises but due to a lack of staff. The reasons for this are complex: political, social and economic.
- 11.3 A recent study by the Health Foundation think tank (June 2022) predicts a national shortfall of 10,700 GPs by 2030/31 and 6,400 nursing vacancies in GP practices by 2030. To make matters worse, Stafford currently has the 7th highest number of patients per GP; 2,537 against a national average of 2,038.
- 11.4 A National Audit Office survey of NHS dentistry in February 2020 indicates that England has an average of 4.4 dentists per 10,000 population, where Italy has 8.3 and Germany 8.5. However, the regional breakdown shows that in North Staffordshire the ratio is just 3.7:10,000 which makes the area the fourth worst in England. When the NAO analysed unsuccessful attempts to get an appointment with an NHS dentist, North Staffordshire was the third worst area.
- 11.5 Similar staff shortages are being reported across a range of NHS professions.
- 11.6 In England ambulance services are now taking an average of over 59 minutes to respond to Category 2 (emergency) calls against a target of 7 minutes. This is the longest average response time since records began.
- 11.7 Regarding Meecebrook, we understand there is a plan to liaise with the local Clinical Commissioning Groups. This should actually be easier now since the CCGs' commissioning functions have been taken over by the Staffordshire Integrated Care Board which includes Local Authorities and GPs in its membership.
- 11.8 However, unless there is a strategic drive with significant additional funding made available to train, incentivise and recruit more primary care professionals in Staffordshire, Meecebrook might struggle to staff a community health centre and it is far from certain that new primary healthcare services will be approved by NHS England, especially during the early phases of the development.
12. Schools
- 12.1 **We are concerned that the promise of a new school for the children of the Meecebrook proposal will not be developed until well into the project with the inevitable consequence that pressure will be placed on existing local schools.**
- 12.2 Have new schools been pledged by Entrust on behalf of Staffordshire County Council? We imagine that even if this is the case, the schools will not be viable in the early stages of the development and therefore road transport will be needed to take children to schools outside of the development. We are not aware of any demographic projections for Meecebrook, nor any feasibility study regarding surplus capacity in local schools that might assure head teachers and parents that the quality of education offered to our children will not be compromised in any way.

- 12.3 It is worrying to note that the Staffordshire County Council Strategic Infrastructure plan estimates that at least 1,000 new houses would be needed to support the provision of a one class intake at primary school level.
- 12.4 We are aware that in Stone there is a three tier school system, but Eccleshall forms part of the Stafford school system which is two tier. Has the Meecebrook Board considered the implications of this on the allocation of school places?

13. Land

Best and most versatile land (BMV)

- 13.1 **We are disappointed to see that significant areas of Grade 2 BMV agricultural land are proposed to be lost to housing and ask whether there has been any consideration of how this might impact on our regional and national food security policy, and on the future of farming in our Borough?**
- 13.2 Paragraph 9.11.3 of the AECOM Sustainability Appraisal (SA) date July 2022 states that "The national dataset serves to suggest a likelihood of Meecebrook being associated with significant areas of 'grade 2' land." It then continues by concluding that, "...it seems likely that Meecebrook comprises BMV land."
- 13.3 Paragraph 9.11.1 states that: "A foremost consideration here is the need to avoid the loss of agricultural land classed as 'best and most versatile' (BMV), which the NPPF defines as that which is grade 1 (highest quality), grade 2 or grade 3a.
- 13.4 The National Planning Policy Framework (NPPF) 2021 includes policies to protect BMV land. For example, paragraph 174 of the NPPF states that:
- "Planning policies and decisions should contribute to and enhance the natural and local environment by:
- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland."
- 13.5 Paragraph 9.11.7 of the Sustainability Appraisal concludes that: "With regards to the selection of greenfield allocations, avoiding the loss of BMV / better quality BMV agricultural land appears not to have had a major bearing on the spatial strategy and site selection process, and there are reasonable alternatives that perform better than the proposed strategy..."
- Previously developed (brownfield) land
- 13.6 **The proposed Garden Community could have made a significant impact on remediating previously developed land and an opportunity has been missed by selecting Meecebrook over the other possible sites that do include previously developed land as well as potentially being better located to existing road and possibly rail infrastructure.**
- 13.7 Paragraph 85 of the NPPF states that: "The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist."
- 13.8 Paragraph 119 of the NPPF states that: "Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land."

- 13.9 Despite this requirement, paragraph 9.11.7 of the Sustainability Appraisal concedes that: *“A fairly limited proportion of growth [within the 2020–40 local plan] is set to be directed to previously developed land”, before concluding that: “...there is no identified ‘reasonable alternative’ strategy that would perform better in this respect.”*
- 13.10 Yarnfield and Cold Meece Parish Council is aware that preliminary proposals for the Meecebrook development had assumed that it would incorporate large parts of the nearby Swynnerton Training Camp owned by the Ministry of Defence (MOD).
- 13.11 Appendix IV of the 2022 Sustainability Appraisal concedes that when it states *“...extensive areas of land thought to be available at the time of the Issues and Options consultation is now unavailable (specifically MOD land at Swynnerton Training Area...)”*.
- 13.12 It is then stated that *“This led the Council to undertake further work to explore land availability, following the Issues and Options consultation, which led to additional land being identified as available. The net effect is that the current site ‘red line boundary’ is shifted significantly to the west, in the direction of Eccleshall, relative to the assumed red line boundary at the time of the Issues and Options consultation.”*
- 13.13 Yarnfield and Cold Meece Parish Council is concerned that this statement implies that rather than reassessing the suitability of the Meecebrook site for development in the absence of the availability of the previously developed and contaminated land within the MOD’s ownership at Swynnerton, Stafford Borough Council simply moved the redline boundary to incorporate more agricultural land on the assumption that it was feasible to be able to obtain a train station and possibly a new motorway junction to serve the site.

14. Land acquisition

- 14.1 **We believe that some landowners whose land is inside the “red line” of the Meecebrook proposal are not prepared to sell their land to the Development Board.**
- 14.2 We understand that compulsory purchase orders are not planned. The refusal by landowners to allow their land to be included within the proposal further undermines the viability of the project and moved it even further away from the stated vision.

15. Carbon neutral development

- 15.1 **We believe a detailed CO₂ balance for the whole life of the project is essential to demonstrate the claim that the Meecebrook Project will produce “carbon neutral communities.”**
- 15.2 The development of Meecebrook on best and most versatile land will result in the release of CO₂ during the development phase and the subsequent loss of a significant CO₂ bank.
- 15.3 No evidence has been provided to assess the CO₂ balance associated with the development of Meecebrook on a greenfield site.

16. Minerals

- 16.1 **We are concerned that the proposed Meecebrook development will sterilise mineral deposits on this “Mineral Safeguarding Area.”**
- 16.2 **Given the requirements of local minerals policy, Yarnfield and Cold Meece Parish Council wishes to understand whether there are any proposals for exploiting any**

remaining and economic mineral resources within Meecebrook prior to its development to avoid or minimise their sterilisation?

- 16.3 The section regarding Meecebrook within the 'New Local Plan Preferred Options' is silent with respect to the location of minerals within the proposed site. However, comparison with the extant 'Policies and Proposals Map for the Minerals Local Plan for Staffordshire (2015-2030)' shows that a significant part of the site is located within a 'Mineral Safeguarding Area'.
- 16.4 The minerals underlying the part of the Meecebrook site within the Minerals safeguarding Area are sand and gravel.
- 16.5 Policy 1 of Strategic Objective 1 of the Minerals Local Plan recognises the importance of sand and gravel deposits as aggregate minerals to support sustainable economic development.
- 16.6 Policy 3 of Strategic Objective 1 of the Minerals Local Plan sets out the importance of such safeguarding nationally and locally important and sets out how it is proposed to prevent resources being sterilised by non-mineral development.
- 16.7 Policy 3 includes requirements for potentially permitting the sterilisation of minerals. Specifically, it requires prospective developers to produce evidence about the existence; quantity; quality and value of the underlying or adjacent mineral resource, and also to outline reasons why the material planning benefits of the non-mineral development would outweigh the material planning benefits of the underlying or adjacent mineral.

17. Radon

- 17.1 **We can find no evidence that the effect of Radon gas on future developments within the Meecebrook proposal has been taken into account.**
- 17.2 Land within the footprint of the Meecebrook proposal is known to be affected by Radon. We can find no assessment of this risk. The presence of radon gas will have consequences for housing developments which will need to build in appropriate measures to protect properties and therefore have an adverse effect on the viability of sites.

18. Areas of Contaminated Land

- 18.1 **We are concerned that there are known areas of contaminated land on or adjacent to the Meecebrook proposal.**
- 18.2 Adjacent to Hilcote Hall is believed to be an area of contaminated land and while it is outside the "red line" for the Meecebrook development the effect will extend 250m into the development area. The area is shown as suitable for housing. If this land remains in the plan investigation into the cost of remediation will be required.

19. Railway Station

- 19.1 **We are concerned that passenger forecasts, both in terms of physical numbers, and when they might occur, are unrealistically optimistic and need to be reassessed.**
- 19.2 **We believe the capacity and rail layout constraints resulting from the HS2 proposals will mean Meecebrook could only be served by one four-car train per hour in each direction and that trains could only utilise the slow lines.**
- 19.3 Although a total of eight station locations were considered, all of these are located on the West Coast Mainline (WCML).

- 19.4 The preferred North option is located to the north of the junction with the Norton Bridge to Stone railway. Since there is no connection between the railways to serve the site, only stations located on the WCML will be directly accessible to future Meecebrook travellers. Consequently, it will not be possible to travel by rail to either Stone or Stoke-on-Trent without changing trains at Stafford. This is likely to put off most potential travellers wanting to access these destinations.
- 19.5 It is proposed to construct platforms alongside all four tracks of the WCML. However, this is not considered realistic for numerous reasons that are set out below.
- 19.6 The demand forecasts for Meecebrook station are based on passengers living within the development itself; those living locally within a 5km radius of the station; and those passengers abstracted from other stations that would choose Meecebrook station as a preferred alternative.
- 19.7 The only notable settlements located within 5km of Meecebrook are Eccleshall and Yarnfield and the nearest alternative station from which passengers could be abstracted is at Stone, which is located on a different railway line, with direct access to destinations, such as Stoke-on-Trent, which cannot be directly accessed from Meecebrook.
- 19.8 It is assumed that Meecebrook station could be opened by 2026 to receive two stopping trains per hour based on trains paths that SLC and Rail Aspects consider will be created by the opening of HS2 Phase 2a. However, main civil engineering construction of Phase 2a is not expected to commence until Quarter 1 2025. With a seven-year construction and track commissioning programme, Phase 2a will not open until 2032 at the earliest. Indeed, it is likely to be later than this as HS2 Ltd has stated that Phase One will be completed between 2029 and 2033. With HS2 Ltd's Chief Executive informing the Transport Select Committee on 2nd November 2022 that Phase 2a is running four years behind Phase One, it is very unlikely that Phase 2a would open before the end of 2033.
- 19.9 When HS2 Phase One opens, all HS2 services north of Birmingham would use the fast lines on the section of the WCML north of Stafford, which would reduce capacity until Phase 2a opens.
- 19.10 In addition, the design of the Phase 2a connections back onto the WCML at Blakenhall, south of Crewe, involves crossing over the slow lines to access the fast lines. This will significantly reduce the number of paths on the WCML slow lines.
- 19.11 Rail Aspects has assumed that Meecebrook station would be served by two trains per hour in each direction. These are the current North West Trains services:
- Crewe to London via the Trent Valley
 - Liverpool to Birmingham
- 19.12 The Crewe to London train starts/ends in a bay platform at Crewe station and currently utilises the WCML slow lines to access the station. The design of the Blakenhall Spurs connection onto the WCML south of Crewe means that it is extremely unlikely that this service could continue once Phase 2a becomes operational.
- 19.13 When Phase 2b opens (2040 at the earliest) some HS2 trains will bypass the Blakenhall Spurs to pass under Crewe via the Crewe Tunnel. However, the cancellation of the Golborne link (a 25km section of high-speed railway that would have connected Phase 2b from Hoo Green in Cheshire to the WCML south of Wigan) means that only Manchester bound HS2 trains will be able to utilise the Crewe Tunnel. All other HS2 services (3 trains per hour in each direction) will continue to use the Blakenhall Spurs and therefore take up valuable paths on the

WCML from south of Crewe and throughout Cheshire, thereby leaving insufficient train paths to enable the Crewe-London service to continue.

- 19.14 The Liverpool to Birmingham train is a four-carriage commuter train that utilises the WCML fast lines through Crewe station. Although it would not be impacted by the Blakenhall Spurs issue, because it needs to access the Birmingham line from Stafford, it would need to have crossed onto the WCML slow lines at Basford Hall south of Crewe.
- 19.15 Since there are no current locations on the WCML between Basford Hall and Meecebrook to switch back onto the fast lines, the Birmingham to Crewe train would remain on the slow lines.
- 19.16 Given the capacity and rail layout constraints outlined above, it would appear that Meecebrook could only be served by one four-car train per hour in each direction and that that could only utilise the slow lines.
- 19.17 Table 1 in the SLC report states that Meecebrook station is expected to generate nearly 45,000 trips by 2026, with more than half these journeys generated from the development itself. By 2030 it is expected that over 133,000 trips would be generated by the Meecebrook development. With the first 300 houses planned for construction in 2030/31 and Phase 2a not opening until at least 2032, the predicted trip numbers would be unachievable.

20. Road Networks

20.1 **We are concerned that:**

- (a) **Unless significant new road infrastructure is constructed by 2030, access to the proposed site is only achievable from either the B5026 Eccleshall Road or via the unclassified Swynnerton Road.**
- (b) **The claim that Meecebrook is located in close proximity to the Strategic Road Network is unfounded.**
- (c) **The local road network around Yarnfield, Cold Meece, Chebsey and Eccleshall is at capacity and is not viable to support the number of vehicle movements that the Meecebrook development will create.**
- (d) **No evidence is presented in the Preferred Options document to support the notion of a new motorway junction.**

- 20.2 It is not possible to undertake a thorough review of the proposals because the Atkins Transport Strategy dates from 2020 and the proposed Transport Logistics Plan is not currently available.
- 20.3 Notwithstanding this constraint, we note that, unless significant new road infrastructure is constructed by 2030, access to the proposed site is only achievable from either the B5026 Eccleshall Road or via the unclassified Swynnerton Road.
- 20.4 The Atkins Transport Strategy claims in Section 1.3 that “The site is located in close proximity to the Strategic Road Network (SRN) with J14 of the M6 located approximately 11km to the south and J15 of the M6 located approximately 8km to the north.” Such distances cannot reasonably be considered close to the SRN, especially since the roads that would need to be utilised from the two motorway junctions are significantly constrained.
- 20.5 Although J14 is potentially closer to Meecebrook, the most direct route is reliant on the use of the A5013 through the villages of Creswell and Great Bridgeford, as well as the heart of Eccleshall. Alternatively, construction traffic would need to use the A34 to Stone and then the A5026 from the Walton Roundabout. Such a diversion would add an additional 3.5 to 4km each way to this supply route.

- 20.6 The route from M6 J15 to the north is also constrained, especially at the busy Hanchurch interchange between the A519 and the A500.
- 20.7 Both motorway junctions will be significantly impacted by HS2 construction traffic, with J15 adjacent to Hanchurch particularly vulnerable as it will be used to supply 17 HS2 construction sites, including via the A519, which would represent the key route to supply construction materials to Meecebrook from the north.
- 20.8 HS2 Phase 2a is scheduled for a minimum five-year construction programme and although this is currently proposed to commence at the beginning of 2025, there is a risk of cumulative effects occurring with the Meecebrook development, especially in the reasonably likely event that the HS2 project construction is delayed or prolonged.
- 20.9 As a consequence of the above, it is important that a full analysis of the HGV movements associated with the Meecebrook proposals is carried out and accompanied with an assessment of the cumulative effects of traffic and especially interaction with HS2 Phase 2a construction traffic, which is likely to overlap with Meecebrook in the early years. It is important that this analysis is undertaken both for entire construction period and in relation to the employment centres on the site.
- 20.10 Paragraph 9.2.4 of the AECOM Sustainability Appraisal Interim Report dated October 2022 states that “Meecebrook may be delivered alongside a new junction on the M6, thereby ensuring that traffic could be directed to the strategic road network...”
- 20.11 No evidence is presented in the Preferred Options document to support the notion of a new motorway junction. Furthermore, this idea (referred to as J14A) has been raised and rejected previously, notably in evidence given by representatives of Stafford Borough in front of the HS2 Phase 2a House of Commons Select Committee in May 2018. There is therefore no provision for J14A in the hybrid Bill for HS2 Phase 2a, which became an Act of Parliament when the Bill received Royal Assent on 11th February 2021.
- 20.12 Paragraph 9.13.4 of the AECOM report states that “The new proposed [Meecebrook] site is notably located between strategic road corridors, such that there will be a need to ensure good links, and the possibility of having to bridge over one or both of the M6 and HS2 corridors might be envisaged. The possibility of new link / relief roads to improve the functioning of the current network has been suggested, albeit in the context of a 11,500 home scheme.”
- 20.13 Such a statement seems to be misguided in a number of respects, not least because the Meecebrook proposals will deliver just 3000 houses within the period covered by the local plan, i.e. 300 per year from 2030/31 until 2040, with the idea of the same level again between 2040 and 2050. Such a level of housing falls well-short of what would be required to justify major infrastructure investment such as a new M6 junction.
- 20.14 Furthermore, the reference to a bridge being required to cross the M6 and HS2 suggests that the authors believe that a new motorway junction with the A51 at Sandyford is realistic. However, this was the location for J14A that was presented in evidence by Stafford Borough Council to the HS2 Phase 2a Select Committee that was rejected on engineering and cost grounds.

21. Assessment of cumulative impacts

- 21.1 **We are concerned that no work has been done to assess the cumulative impact the proposed Meecebrook development and HS2 Phase 2a will have on residents of Yarnfield and Cold Meece.**

- 21.2 Residents of Yarnfield and Cold Meece parish will face disproportionate disruption over many years if HS2 Phase 2a goes ahead.
- 21.3 The parish council is already very concerned about the levels of HS2 HGV construction traffic that will completely isolate our community, disrupt our daily lives and blight our homes for many years.
- 21.4 Advance works relating to the realigned Yarnfield Lane, which would be undertaken to facilitate the proposed Stone Railhead and are scheduled to commence during 2023, will be followed by the construction of the HS2 mainline over a period of at least five years from early 2025. The construction of Meecebrook will overlap with these HS2 works in 2030 and then prolong the impacts on the inadequate local road network for a further 10 years, the effects of which will cumulatively affect traffic used by both residents, emergency services, public transport and employment sites.
- 21.5 A detailed and robust assessment of the cumulative effects of these projects is therefore required to determine whether the proposals are actually sustainable or not.

22. Employment

- 22.1 **We believe the Preferred Options proposal fails to take account of the impact that approved development opportunities at Raleigh Hall Industrial estate and the 85 acre Meaford Business Park will have on the viability of any employment land within the Meecebrook proposals.**
- 22.2 Paragraph 9.7.4 of the AECOM Sustainability appraisal states that “With regards to Meecebrook, there is general support for mixed use new communities, and there are reasons to suggest this is a strong location for employment growth, assuming significant transport infrastructure upgrades, including a train station and good links to the M6.”
- 22.3 Road and rail connectivity for the development of employment land on Meecebrook will be seriously compromised by the poor quality road network in the vicinity of the identified employment land areas.
- 22.4 From the consultation commentary outlined above, it is clear that the assumptions regarding significant transport infrastructure upgrades are highly optimistic and therefore potentially unlikely to happen. Accordingly, the anticipated employment growth at the business parks within Meecebrook is unlikely to be achieved and this will undermine the concept of a self-sustaining garden community.
- 22.5 The Meaford Business Park, with its established access to the A34 and M6 will proved to be a more commercially viable alternative.

23. Social Engineering

- 23.1 **We believe Meecebrook represents a massive degree of social engineering based on a desire to see a fundamental shift away from dependency on cars in a way that is unrealistic.**
- 23.2 “Meecebrook’s vision will be for a garden community that is sustainable in all forms by reducing carbon use and being a self-sufficient community” - but not how it will be achieved.
- 23.3 The phased approach to the development of the site, with the key infrastructure projects not appearing until later in the project, if at all, will inevitably force residents to look to neighbouring communities for support. No connections with either Yarnfield or Eccleshall that support safe walking or cycling, and a poor public transport network, have been provided beyond the footprint of the

proposed development. This in turn will lead to residents having to use motor vehicles as their preferred means of transport.

24. Parish Council Boundary Review

24.1 **We believe that a parish boundary review will be needed to provide a connection between any housing development on the eastern side of the Meecebrook proposal to Yarnfield and Cold Meece.**

24.2 The area of land to the east of the proposed site is close to the existing community of Cold Meece and lies on the border between Yarnfield and Cold Meece Parish and Chebsey Parish. It is separated from the rest of the development land.

24.3 When this area is built on we strongly recommend that there are walking and cycling routes to link it with Yarnfield and Cold Meece and that logically it should form part of Cold Meece ward. In this way the developers could ensure that the new residents were physically and socially connected to the wider community.

2. Stafford Borough Council Preferred Options Paper - Other General Comments

25. Policy 2 – Settlement Hierarchy

25.1 **We believe the Preferred Options proposals should be used to correct an anomaly created by the planning approval that allowed for the construction of 250 houses in Yarnfield outside the settlement boundary.**

25.2 The settlement hierarchy for the borough proposed in Policy 2 places Yarnfield in Tier 4 – large settlement. However, the settlement boundary for Yarnfield has not been updated and approximately 1/3 of the housing in Yarnfield is outside the settlement boundary. While we acknowledged the brownfield site on which these houses and employment land lies is within the North Staffordshire Greenbelt we believe the review of the Local Plan provides an opportunity to correct this anomaly.

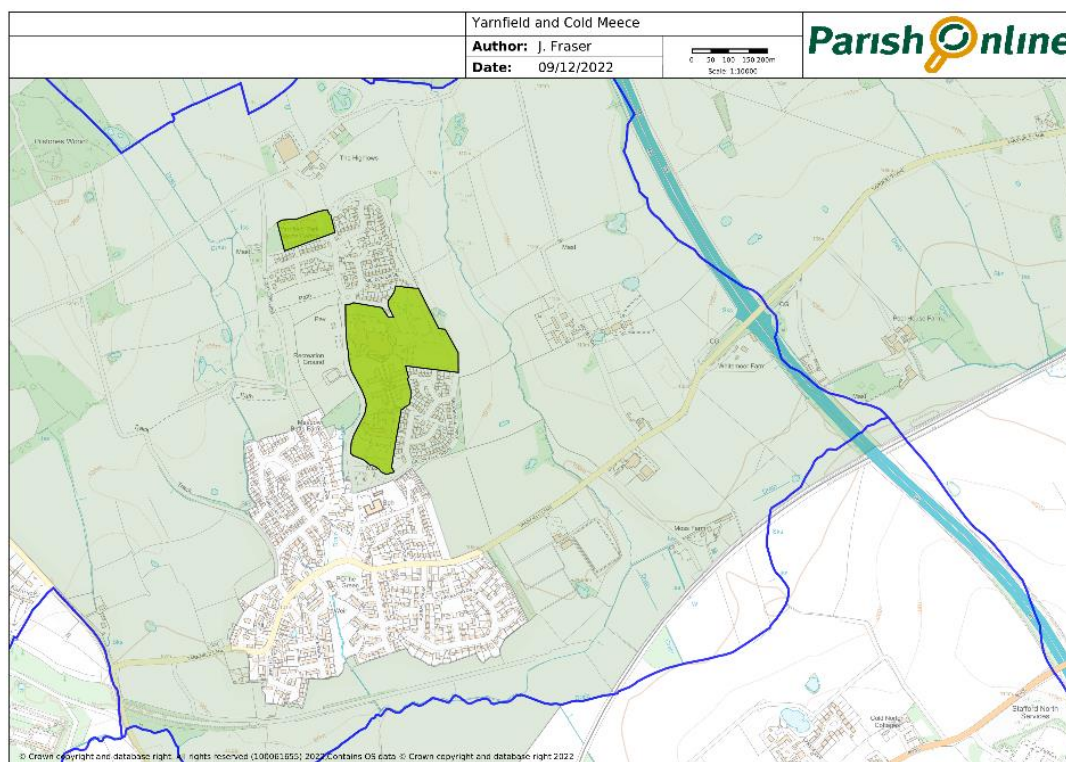
25.3 There is a real possibility that development will come forward during the period covered by the new local plan that would not be possible if the land is left outside the settlement boundary. We have already seen one building demolished on grounds of safety, leaving a 1.2 hectare site with no movement to find an acceptable use of the site. The Parish Council is concerned that the location of the conference centre and office buildings is too central to the village to suffer a similar fate.

26. Policy 5 – North Staffordshire Green Belt

26.1 **The Parish Council values the protection that the North Staffordshire Green belt provides to Yarnfield and in so doing recognises the vital role it plays by preventing inappropriate development. However, to be effective the green belt designation must be meaningful. We believe that the Borough Council's review of the Green Belt and the statement in Policy 5, para 5.3, is incorrect. It is our view that exceptional circumstances exist to justify the removal of Yarnfield Park from the Green Belt.**

26.2 The Parish Council acknowledges the vital role of the North Staffordshire Green Belt and recognises that it prevents urban sprawl and keeps inappropriate developments in check. However, the Parish Council believe that exceptional circumstances exist that would justify the removal of Yarnfield Park from the Green Belt.

- 26.3 The area of land occupied by Yarnfield Park was granted planning permission to build 250 houses in the North Staffordshire Green Belt in 2012 (reference 09/12911/OUT) on brownfield land that had previously been occupied by the British Telecom Training College.
- 26.4 The construction of the houses has resulted in those parts of the site still used by the conference centre and offices, being located towards the centre of Yarnfield.
- 26.5 We believe the remaining parts of Yarnfield Park now fails to meet the NPPF criteria for Green Belt: the northern and southern boundaries of the site are surrounded by housing and the western boundary by an area of public open space and football pitch. As such its purpose can no longer be "to check unrestricted sprawl of large built-up areas"
- 26.6 The National Planning Policy Framework requires that exceptional circumstances should be "fully evidenced and justified, through the preparation or updating of plans". The parish council believes that the review of the Local Plan should be used to remove Yarnfield Park from the Green Belt.



27. Policy 13 Local Green Spaces

- 27.1 **We believe Policy 13, Local Green Space, does not take adequate account of areas of Green Space in Yarnfield which should be afforded the same level of protection.**
- 27.2 The areas of open green space are:

Name	
Ashdale Park	Owner: Stafford Borough Council Provided as part of the housing development
Ford Drive	Owner: Stafford Borough Council Provided as part of the housing development
Yarnfield Park Multiuse Play Area, football pitch	Owner: Hackberry Property UK Ltd

Name	
Worthington Grove Play area	Owner: Barratt West Midlands

- 27.3 These site are an essential asset to residents and have for many years provided an important health and wellbeing function.
- 27.4 The Yarnfield and Cold Meece Parish Council Neighbourhood Plan that is currently being prepared will include these areas as Local Green Spaces.
28. Policy 23 - Affordable Housing
- 28.1 **We are concerned that no provision is made within the Preferred Options proposal for the delivery of affordable housing in the parish. Policy 23 should be redrafted to provide 30% affordable housing on major development sites.**
- 28.2 The settlement hierarchy for the borough proposed in Policy 2 places Yarnfield in Tier 4 – large settlement. No provision is made for an appropriate quota of affordable housing in Policy 23. Even if development in Yarnfield came only from windfall sites these should still include a proportion of affordable housing.